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6 Attorneys for Defendant  
 WALMART INC.

7  
 8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 YIMI VALDOVINOS,

11 Plaintiff,

12 vs.

13 WALMART, INC.; AND DOES 1 THROUGH  
 14 50, INCLUSIVE,

15 Defendants.

Fed Case No. 2:20-CV-0222-KJM-DMC

**STIPULATION AND ORDER TO  
 CONTINUE LITIGATION DEADLINES**

Removal Date: January 29, 2020  
 Trial Date: TBD

16 IT IS HEREBY AGREED AND STIPULATED, by and between all parties, through their  
 17 undersigned counsel, as to the following:

- 18 1. On January 29, 2020, Defendant Walmart, Inc. (“Defendant” or “Walmart”) filed its  
 19 Notice to Court and Adverse Party of Removal to Federal Court.  
 20 2. The Court issued its Initial Pretrial Scheduling Order on April 2, 2020.  
 21 3. The parties subsequently have engaged in substantial discovery and stipulated to  
 22 participate in the Court’s Voluntary Dispute Resolution Program. The Court  
 23 continued all pretrial deadlines in accordance with a 114-day extension of the  
 24 mediation deadline. This matter was ultimately mediated with neutral Sanford  
 25 Kingsley on March 31, 2021 but did not resolve.  
 26 4. Plaintiff has since sent Defendant further written discovery, taken additional  
 27 depositions, and conducted a site inspection of the Walmart facility that employed  
 28 Plaintiff.



