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5 Attorneys for Defendant
 6 GARFIELD BEACH CVS, L.L.C.
 Erroneously sued as CVS PHARMACY, INC.

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11 Attorney for Plaintiff
 CECIL L SWANSON

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO

15 CECIL L. SWANSON,)	Case No. 2:20-CV-00745-TLN-KJN
16 Plaintiffs,)	
17 vs.)	STIPULATION AND ORDER TO AMEND
)	SCHEDULING ORDER
18 CVS PHARMACY, INC. and DOES 1 to 20,)	Date Action Filed: 03/06/20
19 Defendants.)	

20
 21 Plaintiff, CECIL L. SWANSON (“Plaintiff”) and Defendant GARFIELD BEACH CVS,
 22 L.L.C., erroneously sued as CVS PHARMACY, INC. (“Defendant”), by and through their
 23 respective attorneys of record and pursuant to LOCAL RULES 143 AND 144(D) and FRCP
 24 16(B) hereby stipulate and agree as follows:

25 WHEREAS, on March 6, 2020 Plaintiff filed her Complaint in the Sacramento Superior
 26 Court and served Defendant on March 13, 2020.

1 WHEREAS Defendant filed its Notice of Removal, Civil Case Cover Sheet, Notice of
2 Interested Parties and Demand for Trial by Jury on April 13, 2020 in the United States District
3 Court, Eastern District of California – Sacramento.

4 WHEREAS ON October 20, 2020 Defendant served its Initial Disclosure on Plaintiff
5 along with a set of Interrogatories and Request for Production of Documents.

6 WHEREAS on November 4, 2020 Plaintiff served her Initial Disclosure on Defendant,
7 and has requested – and was granted – extensions to the written discovery requests past the
8 current Discovery Cut-Off date of December 16, 2020, due to the Plaintiff’s elderly age and the
9 continued shelter-in-place orders due to the ongoing COVID-19 pandemic.

10 WHEREAS on November 15th an ORDER was entered revising the Discovery deadlines.

11 WHEREAS both Plaintiff and Defendant have propounded and responded to written
12 discovery.

13 WHEREAS on April 22, 2021 the deposition of Plaintiff was taken by Defendant.

14 WHEREAS on May 27, 2021 the parties agreed to Elect Referral of Action to Voluntary
15 Dispute Resolution Program (VDRP) Pursuant to Local Rule 271.

16 WHEREAS several depositions of witnesses need to be administered but the parties
17 prefer to have those depositions taken after the mediation of the matter.

18 WHEREAS the parties have entered into the following stipulation in an effort to jointly
19 resolve these discovery issues and continue to move this case forward.

20 WHEREAS the parties through their respective counsel jointly propose and stipulate to
21 the following deadlines:

<u>EVENT</u>	<u>CURRENT DATE</u>	<u>PROPOSED NEW DATE</u>
Fact Discovery Cut-Off Date	June 30, 2021	November 30, 2021
Expert Disclosures and Reports	August 30, 2021	January 30, 2022
Dispositive Motion Hearing Cutoff	December 28, 2021	May 30, 2021

1	Final Pre-Trial Conference	Not set.	
2	Trial	Not set.	

3
4 IT IS FURTHER STIPULAED and AGREED between the parties that all other
5 provisions of the Pretrial Order shall remain in effect.

6 IT IS SO STIPULATED.

7
8 Dated: June 2, 2021.

LAW OFFICES OF BRIAN H. TURNER

9
10 By: /s/ Brian H. Turner
11 Brian H. Turner
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17
18 Dated: June 2, 2021.

COOPER & SCULLY, P.C.

19 By: /s/ Alan Law
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Attorneys for Defendant GARFIELD BEACH CVS,
L.L.C. erroneously sued as CVS PHARMACY, INC.

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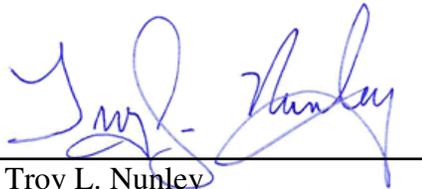
ORDER

FOR GOOD CAUSE SHOWN, and pursuant to the Stipulation of the parties, the deadlines in the Scheduling Order previously set forth by the Court are revised as follows:

<u>EVENT</u>	<u>CURRENT DATE</u>	<u>NEW DATE</u>
Fact Discovery Cut-Off Date	June 30, 2021	November 30, 2021
Expert Disclosures and Reports	August 30, 2021	January 31, 2022
Dispositive Motion Hearing Cutoff	December 28, 2021	June 2, 2022

IT IS SO ORDERED.

Dated: June 2, 2021



Troy L. Nunley
United States District Judge