

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

LUCKIESIA BELTON,
Plaintiff,
v.
INDIGO DYE GROUP CORP.,
Defendant.

Case No. 2:20-cv-02439-JAM-DB

**AMENDED STIPULATION AND JOINT
REQUEST TO MODIFY SCHEDULING
ORDER AND PROPOSED ORDER¹**

Plaintiff Luckiesia Belton and Defendant Indigo Dye Group Corp., by and through their respective Counsel, hereby stipulate, agree, and jointly respectfully move the Court an extension to the deadlines for completion of discovery and for the filing of dispositive motions, and in support state as follows.

On April 8, 2021, the Court entered its Pretrial Scheduling Order setting a discovery completion date of January 7, 2021 and a dispositive motions deadline of February 18, 2022. Dkt. 10. The Parties have been working diligently to meet these deadlines. However, due to COVID related illness, the Parties have had to reschedule depositions in this matter multiple times and have not been able to complete Defendant's Fed. R. Civ. P. 30(b)(6) deposition or Plaintiff's deposition.

The Parties respectfully jointly request that the Court extend the discovery completion and dispositive motions deadlines as described below to allow completing of depositions in this matter and allow the Parties to properly support their dispositive motions. This is the Parties first request for an extension, which is made in good faith and not for the purpose of delay.

NOW, THEREFORE, based on the foregoing, the Parties stipulate and agree and jointly request that the Court find there is good cause to modify the Scheduling Order as follows:

Discovery Cutoff Date:	2/7/2022;
Dispositive Motion Filing Deadline:	3/21/2022;

¹ Amended pursuant to the Court's direction to reflect schedule the Court has informed the Parties it can accommodate.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dispositive Motion Hearing: 5/3/2022 at 1:30 PM;
Joint Mid-Litigation Statement Filing Deadline:
Fourteen (14) days prior to the close of discovery;
Final Pretrial Conference: 6/17/2022 at 10:00 AM; and
Jury/Bench Trial 8/1/2022 at 9:00 AM.

Dated: January 7, 2022
Respectfully submitted,

By: /s/ Donald Walker (with express permission)
Attorney for Defendant
Indigo Dye group Corp.

By: /s/ Ignacio J. Hiraldo
IJH LAW
Ignacio J. Hiraldo
Pro Hac Vice
Florida Bar No. 56031
1200 Brickell Ave Suite 1950
Miami, FL 33131
Email: ijhiraldo@ijhlaw.com
Telephone: 786.469.4496

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Having read and considered the Amended Stipulation and Joint Request to Modify Scheduling Order dated January 7, 2021 (“Stipulation”), and good cause appearing, the Court hereby GRANTS the Parties’ joint request and ORDERS that the Pretrial Scheduling Order, Dkt. 10, be modified as follows:

- Discovery Cutoff Date: 2/7/2022;
- Dispositive Motion Filing Deadline: 3/21/2022;
- Dispositive Motion Hearing: 5/3/2022 at 1:30 PM;
- Joint Mid-Litigation Statement Filing Deadline:
Fourteen (14) days prior to the close of discovery;
- Final Pretrial Conference: 6/17/2022 at 10:00 AM; and
- Jury/Bench Trial 8/1/2022 at 9:00 AM.

IT IS SO ORDERED.

Dated: January 7, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE