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6 Attorneys for Defendant
 PHI Health, LLC (erroneously sued as
 7 PHI Air Medical, LLC and PHI Health,
 LLC)

8 *[Plaintiffs' Counsel Continued on Next Page]*
 9

10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

12 JACQUELINE MARSHALL,
 13 LANCE PHILLIPS, KRISTEN
 KNOWLES, CHRIS ANDERSON,
 14 KAYVAN MARSHALL, KANE
 EDWARDS, JORDAN MOSER,
 15 KYLE EVANS, JENNA DIAZ,
 TERRI MAURICIO, ERIK
 16 RUBALCAVA, JOANN LEE,
 TEISLEYE SMITH, JOSEPH
 17 LOEHNER, LAUREN YOUNG,
 KELLI ROSSETTO-SCHRADER,
 18 BRITNEY EWERS, TRACIE
 STIERS, MARISSA JOHANSON,
 19 HEATHER IMHOF, CAROLE
 COVEY, OLSA HAHN,
 20 STEPHANIE SWISHER, JOHN
 SICKMAN, LAUREN SCHINDLER
 AND MARK HARMON, individuals,
 21 on behalf of themselves and on behalf
 of themselves and on behalf of all
 22 persons similarly situated,

23 Plaintiffs,

24 v.

25 PHI AIR MEDICAL, LLC, a Limited
 Liability Company; PHI HEALTH,
 26 LLC, a Limited Liability Company;
 and Does 1 through 50, Inclusive,
 27

28 Defendants.

CASE NO.: 2:20-cv-02475-MCE-DMC

[Previously assigned to Lassen County Superior Court, Case No. 62973]

**JOINT STIPULATION AND ORDER
 TO MODIFY PRE-TRIAL
 SCHEDULING ORDER**

State Complaint Filed: October 1, 2020
 Removal Filed: December 14, 2020
 Trial Date: Not Set

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13 Knowles, Chris Anderson, Kayvan Marshall,
14 Kane Edwards, Jordan Moser, Kyle Evans,
15 Jenna Diaz, Terri Mauricio, Erik Rubalcava,
16 Joann Lee, Teisleye Smith, Joseph Loehner,
17 Lauren Young, Kelli Rossetto-Schrader,
18 Britney Ewers, Tracie Stiers, Marissa
19 Johanson, Heather Imhof, Carole Covey,
20 Olsa Hahn, Stephanie Swisher, John
21 Sickman, Lauren Schindler and Mark
22 Harmon

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1 IT IS HEREBY STIPULATED AND AGREED, between the parties
2 through their counsel of record as follows:

3 WHEREAS, on December 15, 2020 this Court entered an Initial Pre-Trial
4 Scheduling Order outlining the deadlines for discovery, motion practice, and trial
5 readiness. ECF No. 3.

6 WHEREAS, the parties recently agreed to pursue mediation with Mark
7 Rudy, which is currently scheduled for July 27, 2021.

8 WHEREAS, the parties wish to conserve resources for settlement by
9 postponing further formal discovery pending the results of mediation.

10 Federal Rule of Civil Procedure 16(b)(4) allows that a case management
11 schedule “may be modified only for good cause and with the judge’s consent.” *See*
12 *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 608 (9th Cir. 1992). Similar
13 requests to amend a scheduling order to allow for mediation have been approved
14 in this District. *See, e.g.*, *Brisbin v. Calmat Co.*, No. 1:11-CV-00568-AWI, 2013
15 WL 3322698, at *1 (E.D. Cal. July 1, 2013).

16 Good cause having been shown, the parties respectfully request that the
17 Court modify its Pre-Trial Scheduling Order, ECF No. 3, subject to the Court’s
18 availability, to continue the following deadlines by 180 days to allow the parties to
19 complete discovery and motion practice in a timely manner, pending the results of
20 mediation:

Event	Original Deadline	Requested Deadline
Deadline to complete Rule 26(f) conference	February 12, 2021	August 11, 2021
Deadline to complete all discovery, except for expert discovery	December 21, 2021	June 19, 2022
First expert disclosure deadline	February 18, 2022	August 17, 2022
Second expert disclosure deadline	March 21, 2022	September 17, 2022

1 2 3	Deadline to file joint notice of trial readiness (if dispositive motions are not heard)	April 20, 2022	October 17, 2022
4 5	Deadline to file all dispositive motions	June 16, 2022	December 13, 2022

6 IT IS SO STIPULATED.

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8 Dated: February 11, 2021

Respectfully submitted,

FISHER & PHILLIPS LLP

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11 By: Isl Kathryn M. Evans
12 James C. Fessenden
13 Kathryn M. Evans
14 Attorneys for Defendant
15 PHI Health, LLC (erroneously sued as
16 PHI Air Medical, LLC and PHI
17 Health, LLC)

18 Dated: February 11, 2021

**BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP**

19 By: Isl Piya Mukherjee
20 Norman B. Blumenthal
21 Kyle R. Nordrehaug
22 Nicholas J. De Blouw
23 Victoria B. Rivapalacio
24 Piya Mukherjee
25 Charlotte E. James
26 Aparajit Bhowmil
27 Attorneys for Plaintiffs
28 Jacqueline Marshall, Lance Phillips,
Kristen Knowles, Chris Anderson,
Kayvan Marshall, Kane Edwards,
Jordan Moser, Kyle Evans, Jenna Diaz,
Terri Mauricio, Erik Rubalcava, Joann
Lee, Teisleye Smith, Joseph Loehner,
Lauren Young, Kelli Rossetto-
Schrader, Britney Ewers, Tracie Stiers,
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Swisher, John Sickman, Lauren
Schindler and Mark Harmon

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ATTESTATION REGARDING ELECTRONIC SIGNATURES

I, Kathryn M. Evans, attest that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury, under the laws of the United States of America and the State of California, that the foregoing is true and correct.

Kathryn M. Evans

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JACQUELINE MARSHALL,
LANCE PHILLIPS, KRISTEN
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EDWARDS, JORDAN MOSER,
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STIERS, MARISSA JOHANSON,
HEATHER IMHOF, CAROLE
COVEY, OLSA HAHN,
STEPHANIE SWISHER, JOHN
SICKMAN, LAUREN SCHINDLER
AND MARK HARMON, individuals,
on behalf of themselves and on behalf
of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

v.

PHI AIR MEDICAL, LLC, a Limited
Liability Company; PHI HEALTH,
LLC, a Limited Liability Company;
and Does 1 through 50, Inclusive,

Defendants.

CASE NO.: 2:20-cv-02475-MCE-DMC

*[Previously assigned to Lassen County
Superior Court, Case No. 62973]*

**ORDER TO MODIFY PRE-TRIAL
SCHEDULING ORDER**

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Trial Date: Not Set

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ORDER

Having reviewed the Plaintiffs' and Defendant's Stipulated Request, the Court grants the request and ORDERS that the Pre-Trial Scheduling Order, ECF No. 3, is modified as follows:

Event	Original Deadline	Requested Deadline
Deadline to complete Rule 26(f) conference	February 12, 2021	August 11, 2021
Deadline to complete all discovery, except for expert discovery	December 21, 2021	June 19, 2022
First expert disclosure deadline	February 18, 2022	August 17, 2022
Second expert disclosure deadline	March 21, 2022	September 17, 2022
Deadline to file joint notice of trial readiness (if dispositive motions are not heard)	April 20, 2022	October 17, 2022
Deadline to file all dispositive motions	June 16, 2022	December 13, 2022

The parties are ordered to file a Joint Notice of Trial Readiness not later than thirty (30) days after receiving this Court's ruling on the last filed dispositive motion. The parties are to set forth in their Notice of Trial Readiness, the appropriateness of special procedures, whether this case is related to any other case(s) on file in the Eastern District of California, the prospect for settlement, their estimated trial length, any request for a jury, and their availability for trial. After review of the parties' Joint Notice of Trial Readiness, the Court will issue an order that sets forth new dates for a final pretrial conference and trial.

IT IS SO ORDERED.

DATE: February 18, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE