

1 Scott Philip Jang (State Bar No. 260191)
 Robert Yang (State Bar No. 312964)
 2 JACKSON LEWIS P.C.
 50 California Street, 9th Floor
 3 San Francisco, California 94111-4615
 Telephone: (415) 394-9400
 4 Facsimile: (415) 394-9401
 E-mail: Scott.Jang@jacksonlewis.com
 5 E-mail: Rob.Yang@jacksonlewis.com

6 Attorneys for Defendant
 INTEL CORPORATION

7
 8 Marta R. Vanegas (State Bar No. 278328)
 Brittany C. Toth (State Bar No. 324593)
 VANEGAS LAW GROUP, APC
 9 3100 Oak Road, Suite 230
 Walnut Creek, CA 95497
 10 Telephone: (925) 937-5433
 Facsimile: (925) 938-5567

11 Attorneys for Plaintiff
 12 SONIA RANDHAWA

13
 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

17 SONIA RANDHAWA,

18 Plaintiff(s),

19 v.

20 INTEL CORPORATION,

21 Defendant(s).

Case No. 2:21-cv-00054-KJM-DB

**JOINT STIPULATION AND
 AMENDED ORDER TO EXTEND
 DISCOVERY AND DISPOSITIVE
 MOTION DEADLINES**

FAC Filed: 03/11/2021
 Trial Date: None

22
 23
 24 Defendant INTEL CORPORATION (“Defendant”) and Plaintiff SONIA RANDHAWA
 25 (“Plaintiff”) (collectively, the “Parties”) by and through their respective counsel of record,
 26 hereby stipulate and agree as follows:

27 ///

28 ///

- 1 1. WHEREFORE, on or about November 8, 2022, the Court granted the Parties’
- 2 Stipulation to Modify Scheduling Order Re: Discovery and Dispositive Motion
- 3 Deadlines [ECF Doc. No. 27].
- 4 2. WHEREFORE, the current scheduling order sets the following deadlines: (1) fact
- 5 discovery completed by January 30, 2022; (2) expert disclosures completed by
- 6 February 17, 2023; (3) rebuttal expert witnesses exchanged by February 28, 2023;
- 7 (4) all expert discovery completed by March 13, 2023; and (5) dispositive motions
- 8 heard by June 30, 2023.
- 9 3. WHEREFORE, the Parties have been actively trying to complete discovery since
- 10 the Court issued its Order denying Defendant’s Motion to Dismiss, on March 31,
- 11 2022 [ECF Doc. No. 21], to meet the current discovery deadline of January 30,
- 12 2023;
- 13 4. WHEREFORE, the Parties have met and conferred and agreed that the Parties need
- 14 additional time to exchange discovery, including the need to conduct E-Discovery,
- 15 which includes additional data custodians identified by Plaintiff.
- 16 5. THEREFORE, the Parties stipulate and respectfully request the Court to extend
- 17 the current scheduling order as follows:

Event	Current Date	New Proposed Date
Fact Discovery Cutoff	01/30/2023	04/30/2023
Expert Disclosure	02/17/2023	05/15/2023
Rebuttal Expert Witness Exchange	02/28/2023	05/30/2023
All Expert Discovery Completed	03/13/2023	06/14/2023
Dispositive Motion Heard By	06/07/2023	10/07/2023

///

1 IT IS SO STIPULATED.

2 Dated: December 15, 2022

JACKSON LEWIS P.C.

3

4 By: /s/ Scott P. Jang
5 Scott Philip Jang
6 Robert Yang
7 Attorneys for Defendant
8 INTEL CORPORATION

7 Dated: December 15, 2022

MARTIN & VANEGAS, APC

8

9 By: /s/ Iustina G. Mignea
10 Marta R. Vanegas
11 Brittany C. Toth
12 Iustina G. Mignea
13 Attorneys for Plaintiff
14 SONIA RANDHAWA

9

10

11

12

13 **AMENDED ORDER**

14

15 Pursuant to the Parties' amended stipulation and good cause appearing, the scheduling
16 order (ECF Doc. No. 27) is modified as follows:

16

Event	New Date
Fact Discovery Cutoff	04/30/2023
Expert Disclosure	05/15/2023
Rebuttal Expert Witnesses Exchange	05/30/2023
All Expert Discovery Completed	06/14/2023
Dispositive Motions Heard By	10/13/2023

17

18

19

20

21

22

23

24 The court does not have hearings on October 7, 2023. Thus dispositive motions shall be
25 heard by October 13, 2023.

25

IT IS SO ORDERED.

26

DATED: December 23, 2022.

27

28 
CHIEF UNITED STATES DISTRICT JUDGE

28