

1 Alden J. Parker (SBN 196808)  
 E-Mail: aparker@fisherphillips.com  
 2 Christopher S. Alvarez (SBN 294795)  
 E-Mail: calvarez@fisherphillips.com  
 3 FISHER & PHILLIPS LLP  
 621 Capitol Mall, Suite 1400  
 4 Sacramento, California 95814  
 Telephone: (916) 210-0400  
 5 Facsimile: (916) 210-0401

6 Attorneys for Defendant  
 G & B GROCERS dba RANCHO CORDOVA  
 7 GROCERY OUTLET [*erroneously sued as G & B GROCERS*  
*doing business as Grocery Outlet*]  
 8

9 UNITED STATES DISTRICT COURT  
 10 EASTERN DISTRICT OF CALIFORNIA

11  
 12 MAURSHAE SMITH, on behalf of herself and  
 all others similarly situated,

13 Plaintiff,

14 v.

15 G & B GROCERS, a California corporation,  
 16 doing business as Grocery Outlet, and DOES 1-  
 10,

17 Defendants.  
 18

Case No: 2:21-cv-01504-MCE-AC

**JOINT STIPULATION TO CONTINUE  
 DEADLINES IN INITIAL PRETRIAL  
 SCHEDULING ORDER; ORDER**

Complaint Filed: August 22, 2021  
 Trial Date: None Set

1 IT IS HEREBY STIPULATED AND AGREED, between Plaintiff MAURSHAE SMITH's  
2 ("Plaintiff"), G & B GROCERS dba RANCHO CORDOVA GROCERY OUTLET [*erroneously sued*  
3 *as G & B GROCERS doing business as Grocery Outlet*] ("Defendant"), through their respective counsel  
4 of record, as follows:

5 WHEREAS, on August 23, 2021, the Court entered an Initial Scheduling Order (ECF No. 4);

6 WHEREAS, on September 20, 2022, the Parties submitted a Joint Stipulation to Continue  
7 Deadlines in Initial Pretrial Scheduling Order (ECF No. 10);

8 WHEREAS, on September 27, 2022, the Court entered its Order on Joint Stipulation to Continue  
9 Deadlines in Initial Pretrial Scheduling Order (ECF No. 11);

10 WHEREAS, this Joint Stipulation is not entered into with the intent to delay;

11 WHEREAS, by continuing the discovery and other deadlines set forth herein, there is no  
12 prejudice to any party;

13 WHEREAS, the parties desire to avoid unnecessary costs associated with these deadlines before  
14 completing essential non-expert, and fact discovery while the Parties continue to discuss potential  
15 resolution, as incurring said costs on both sides may be an impediment to resolving this case;

16 WHEREAS, good cause exists for granting the Parties' request to extend the following deadlines  
17 by thirty (30) days in accordance with Federal Rules of Civil Procedure Rule 29;

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 NOW THEREFORE, the Parties respectfully request that the Court modify its Order on Joint  
2 Stipulation to Continue Deadlines in Initial Pretrial Scheduling Order, ECF No. 11, and continue the  
3 following deadlines:

| Event   | Existing Deadline | Requested Deadline |
|---|-------------------|--------------------|
| Deadline to complete all non-expert discovery             | November 21, 2022 | December 21, 2022  |
| Deadline to complete fact discovery                       | December 20, 2022 | January 20, 2023   |
| Deadline to file dispositive motions                      | January 20, 2023  | February 20, 2023  |
| Deadline to exchange expert disclosures                   | February 21, 2023 | March 23, 2023     |
| Deadline to serve supplemental list of expert disclosures | March 20, 2023    | April 19, 2023     |

4  
5  
6  
7  
8  
9  
10  
11  
12  
13 IT IS SO STIPULATED.

14 DATE: November \_\_, 2022

NUNES WORKER RIGHTS LAW, APC

15  
16  
17 By: \_\_\_\_\_  
Anthony J. Nunes  
18 Attorneys for Plaintiff  
19 MAURSHAE SMITH

20 Dated: November \_\_, 2022

FISHER & PHILLIPS LLP

21  
22  
23 By: \_\_\_\_\_  
Alden J. Parker  
24 Christopher S. Alvarez  
25 Attorneys for Defendant  
26 G & B GROCERS dba RANCHO CORDOVA  
27 GROCERY OUTLET [erroneously sued as  
28 G & B GROCERS doing business as  
Grocery Outlet]


**ORDER**

Having read and considered the Parties' Joint Stipulation, for good cause appearing, IT IS  
HEREBY ORDERED as follows:

1. Deadline to complete all non-expert discovery: December 21, 2022;
2. Deadline to complete fact discovery: January 20, 2023;
3. Deadline to file dispositive motions: February 20, 2023;
4. Deadline to exchange expert disclosures: March 23, 2023; and
5. Deadline to serve supplemental list of expert disclosures: April 19, 2023.

**IT IS SO ORDERED.**

**Dated: November 20, 2022**

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