	1 2 3 4 5 6 7 8	Lori A. Reihl, Esq., Bar No. 246395 MORDAUNT, ROUNDY, REIHL & JIMERSON A Professional Law Corporation 7488 Shoreline Drive, Suite B1 Stockton, CA 95219 Telephone: (209) 473-8732 Facsimile: (209) 957-9165 Ireihl@mrrjlaw.com Attorneys for Defendant TARGET CORPORATION UNITED STATES DISTRICT COURT		
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	10	Cherry Wardsworth,) Case No. 2:22-cv-01772-DJC-DMC	
	10	Plaintiff(s),) STIPULATION REGARDING CASE DATES) AND DEADLINES AND ORDER	
	12	VS.		
	12	Target Corporation; and DOES 1 to 20,		
	13	Defendant(s).		
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	16	Under the initial Pretrial Scheduling (Order in this action (Docket No. 10), a jury trial was	
	17	set for October 21, 2024 before District Judge Dale A. Drozd. The initial Pretrial Scheduling Order also set fact discovery, expert discovery, and motion deadlines.		
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	19	Then, on April 6, 2023, this court issu	an Order of Reassignment, ordering that this case	
	20	was reassigned from District Judge Dale A. I	Drozd to District Judge Daniel J. Calabretta. That	
		order stated that all pretrial conference and trial dates currently set were vacated and shall be reset,		
	as necessary, by the reassigned Court. It was the parties' mutual understanding that the court			
	22	vacating of the trial dates in this matter, vacated all scheduled dates and deadlines in the prior		
	23 24	Pretrial Scheduling order.		
	25	On September 22, 2023, this court iss	sued a Minute Order, providing, "Due to the	
	23 26	reassignment of this case to District Judge Da	aniel J. Calabretta, and on the Court's own motion, a	
	20	Pretrial Conference is SET for 8/29/2024 at 1:30 PM and a Jury Trial is SET for 10/21/2024 at 9:00		
Mordaunt,	27	AM, in Courtroom 10, both before District Judge Daniel J. Calabretta." (See Docket No. 15.)		
& Jimerson 7488 Shoreline Drive, Suite B1 Stockton, CA 95219 (209) 473-8732	20	However, no new Scheduling Order has been	n issued in this case and the parties are currently 1	
		STIPULATION REGARDING CASE DATES AN	D DEADLINES AND ORDER	

	1 2 3 4	without an operative scheduling order in this matter. Further, disclosure deadlines had already passed on the prior scheduling order before the most recent order setting the current trial date in this matter. THEREFORE, it is hereby stipulated and agreed among the parties, through counsel, that
	5 6 7 8	 that the case dates and deadlines in this matter shall be set as follows: All fact discovery shall be completed no later than July 26, 2024 The parties shall disclose initial experts and produce reports in accordance with Federal Rule of Civil Procedure 26(a)(2) by no later than March 28, 2024. With
	9 10 11 12	 regard to expert testimony intended solely for rebuttal, those experts shall be disclosed and reports produced in accordance with Federal Rule of Civil Procedure 26(a)(2) on or before April 16, 2024. All expert discovery shall be completed no later than July 26, 2024.
	 13 14 15 16 17 18 	 All motions, except motions for continuances, temporary restraining orders, or other emergency applications, shall be served on or before August 29, 2024, and shall be noticed for hearing before Judge Calabretta on October 3, 2024 at 1:30pm in Courtroom 10, before District Judge Daniel J. Calabretta, in accordance with the timing requirements of Local Rules. The Pretrial Conference shall be continued to December 12, 2024 at 1:30pm in
	 19 20 21 22 23 	 Courtroom 10, before District Judge Daniel J. Calabretta. The jury trial shall be continued to February 10, 2025 at 9:00am in Courtroom 10, before District Judge Daniel J. Calabretta.
Mordaunt, Roundy, Reihl	24 25 26 27	Dated: February 2, 2025 TORKLAW By: May R. M By: May R. M Shelly Raiszadeh, Esq. Tracy Horn, Esq. Attorneys for Plaintiff CHERRY WARDSWORTH
& Jimerson 7488 Shoreline Drive, Suite B1 Stockton, CA 95219 (209) 473-8732	28	2 STIPULATION REGARDING CASE DATES AND DEADLINES AND ORDER

	Dated: February 5, 2025 MORDAUNT, ROUNDY, REIHL & JIMERSON By: <u>/s/Lori Reihl</u> Lori A. Reihl, Esq. Attorneys for Defendant TARGET CORPORATION		
	ORDER		
9	Good cause having been shown,		
1	IT IS HEREBY ORDERED that the case dates and deadlines in this matter shall be set as		
11 12	follows:		
	• All fact discovery shall be completed no later than July 26, 2024		
1	• The parties shall disclose initial experts and produce reports in accordance with		
1	Federal Rule of Civil Procedure 26(a)(2) by no later than March 28, 2024 . With		
1	regard to expert testimony intended solely for rebuttal, those experts shall be		
1	disclosed and reports produced in accordance with Federal Rule of Civil Procedure 26(a)(2) on or before April 16, 2024.		
17 18 19 20 21 22			
	• All expert discovery shall be completed no later than July 26, 2024 .		
	• All motions, except motions for continuances, temporary restraining orders, or other		
	emergency applications, shall be served on or before August 29, 2024, and shall be		
	noticed for hearing before Judge Calabretta on October 3, 2024 at 1:30pm in Courtroom 10, before District Judge Daniel J. Calabretta.		
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2	Courtroom 10, before District Judge Daniel J. Calabretta.		
2	• The jury trial shall be continued to February 10, 2025 at 9:00am in Courtroom 10,		
2	before District Judge Daniel J. Calabretta.		
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Mordaunt, Roundy, Reihl & Jimerson 7488 Shoreline Drive, Suite B1 Stockton, CA 95219	Dated: February 6, 2024 /S/ Daniel J. Calabretta		
(209) 473-8732	3		
	STIPULATION REGARDING CASE DATES AND DEADLINES AND ORDER		