

**P O R T E R | S C O T T**

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Attorneys for Defendants BOARD OF TRUSTEES OF CALIFORNIA STATE UNIVERSITY, (also erroneously sued as CALIFORNIA STATE UNIVERSITY, SACRAMENTO; and STATE OF CALIFORNIA) and ELVIA RAMIREZ

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

BOOKER COOK, an individual,

**CASE NO.: 2:23-cv-00843-DJC-CKD**

Plaintiff,

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

v.

BOARD OF TRUSTEES OF CALIFORNIA STATE UNIVERSITY; CALIFORNIA STATE UNIVERSITY, SACRAMENTO; STATE OF CALIFORNIA; ELVIA RAMIREZ, an individual; and DOES 1 through 50, inclusive,

Complaint Filed: 10/14/2022

First Amended Complaint Filed: 12/16/2022

Removed: 5/5/2023

Second Amended Complaint Filed: 6/16/2023

Defendants.

\_\_\_\_\_ /

This Stipulation is entered into by and between Plaintiff BOOKER COOK (“Plaintiff”) and Defendants BOARD OF TRUSTEES OF CALIFORNIA STATE UNIVERSITY, (also erroneously sued as CALIFORNIA STATE UNIVERSITY, SACRAMENTO; and STATE OF CALIFORNIA) and ELVIA RAMIREZ (“Defendants”) through their respective counsel of record. The Parties enter into this stipulation and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of the scheduling order. The parties request to briefly continue the non-expert discovery deadline for 60 days solely as it pertains to the deposition of one third-party witness.

1 WHEREAS, trial is currently set for June 16, 2025;

2 WHEREAS, on July 6, 2023, the Court issued a Scheduling Order setting the non-expert discovery  
3 cut-off date as June 14, 2024;

4 WHEREAS, the parties have diligently been participating in non-expert discovery, including the  
5 exchange of several sets of written discovery and conducting depositions;

6 WHEREAS, the parties intend to complete one additional deposition of third-party witness Dr.  
7 Boatamo Mosupyoe. However, due to scheduling conflicts between counsel and the witness, the parties are  
8 unable to complete the deposition prior to the close of discovery;

9 WHEREAS, the parties have conferred and propose that the non-expert discovery deadline be  
10 continued to August 14, 2024 solely as it pertains to the completion of the deposition of Dr. Mosupyoe and  
11 any related motions arising out of such deposition.

12 **IT IS SO STIPULATED.**

13  
14 Dated: June 5, 2024

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15  
16 By /s/ David R. Norton  
17 Carl L. Fessenden  
18 David R. Norton  
19 Larissa C. Celaya  
20 Attorneys for Defendants BOARD OF TRUSTEES  
OF CALIFORNIA STATE UNIVERSITY and  
21 ELVIA RAMIREZ

22 Dated: June 4, 2024

Law Offices of Johnny L. Griffin, III

23  
24 By \_\_\_\_\_  
25 Johnny L. Griffin, III  
26 Manolo Olaso  
Attorneys for Plaintiff BOOKER COOK

1 **ORDER**

2 PURSUANT TO THE PARTIES' STIPULATION AND GOOD CAUSE APPEARING, the deadline  
3 for Non-Expert Discovery is extended to August 14, 2024 solely as it pertains to the completion of the  
4 deposition of Dr. Boatamo Mosupyoe and any related motions arising out of such deposition.

5  
6 **IT IS SO ORDERED.**

7  
8 Dated: June 5, 2024

/s/ Daniel J. Calabretta

9 THE HONORABLE DANIEL J. CALABRETTA  
10 UNITED STATES DISTRICT JUDGE