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14 Attorneys for Defendants
 15 PRIME NOW LLC and AMAZON.COM
 SERVICES LLC

17 UNITED STATES DISTRICT COURT
 18 EASTERN DISTRICT OF CALIFORNIA
 19 SACRAMENTO DIVISION

21 SHEILA ROWELA CAFE, an individual,
 22 Plaintiff,

23 v.

24 PRIME NOW LLC, a limited liability company;
 25 AMAZON.COM SERVICES, LLC, a limited
 liability company; and DOES 1 through 20,
 26 inclusive,

27 Defendants.

Case No. 2:23-cv-02867-TLN-KJN

**JOINT STIPULATION TO MODIFY
 SCHEDULING ORDER; ORDER**

Trial Date: Not Yet Set
 Complaint Filed: October 30, 2023

1 Plaintiff SHEILA ROWELA CAFE (“Plaintiff”) and Defendants PRIME NOW LLC and
2 AMAZON.COM SERVICES LLC (“Defendants”) (collectively Plaintiff and Defendants are referred
3 to herein as the “Parties”), by and through their respective counsel of record, hereby stipulate to
4 continue the deadlines set by the Initial Pretrial Scheduling Order (ECF Dkt. 3).

5 WHEREAS, Plaintiff filed the operative Complaint on **October 30, 2023**, in the
6 Superior Court of California, County of Sacramento;

7 WHEREAS, Defendants removed this matter to the United States District Court,
8 Eastern District of California on **December 7, 2023**;

9 WHEREAS, on **December 8, 2023**, the Court issued an Initial Pretrial Scheduling
10 Order that set forth the following litigation dates:

- 11 - Non-expert discovery completion date – **August 5, 2024** (240 days after removal);
- 12 - Expert witness disclosure deadline – **October 4, 2024** (60 days after close of
13 discovery);
- 14 - Supplemental expert witness disclosure deadline – **November 4, 2024** (30 days after
15 initial expert witness disclosures);
- 16 - Supplemental discovery completion date – **January 2, 2025** (30 days prior to the
17 dispositive motion deadline); and
- 18 - Dispositive motion deadline – **February 1, 2025** (180 days after close of discovery);

19 WHEREAS, the Parties have agreed to participate in a private mediation currently
20 scheduled to be held on **August 19, 2024**, and the Parties seek to stay litigation activities in order to
21 focus their efforts on potential resolution of this matter;

22 WHEREAS, the Parties respectfully request that the Court modify the Initial Pretrial
23 Scheduling Order and reset the litigation dates as follows (or other dates as the Court sees fit);

- 24 - Non-expert discovery completion date – **November 19, 2024**;
- 25 - Expert witness disclosure deadline – **January 17, 2025**;
- 26 - Supplemental expert witness disclosure deadline – **February 17, 2025**;
- 27 - Supplemental discovery completion date – **April 18, 2025**; and
- 28 - Dispositive motion deadline – **May 19, 2025**.

1
2 Dated: May 10, 2024

LAW OFFICES OF RAMIN R. YOUNESSI, APC

3
4 /s/ Chris S. Afgani (as authorized on 5/9/24)

Ramin R. Younessi
Samantha L. Ortiz
Christopher S. Afgani

6 Attorneys for Plaintiff
7 SHEILA ROWELA CAFE

8
9 Dated: May 10, 2024

LITTLER MENDELSON, P.C.

10
11 /s/ Douglas L. Ropel

Britney N. Torres
Douglas L. Ropel

13 Attorneys for Defendants
14 PRIME NOW LLC and AMAZON.COM
SERVICES LLC

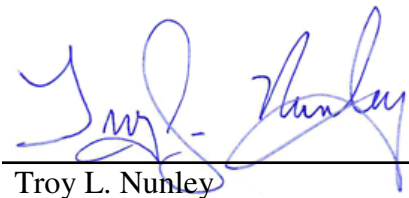
15 **ORDER**

16 AS STIPULATED, the Pretrial Scheduling Order is modified as follows:

- 17 - Non-expert discovery completion date – **November 19, 2024**;
- 18 - Expert witness disclosure deadline – **January 17, 2025**;
- 19 - Supplemental expert witness disclosure deadline – **February 18, 2025**;
- 20 - Supplemental discovery completion date – **April 18, 2025**; and
- 21 - Dispositive motion deadline – **May 19, 2025**.

22 IT IS SO ORDERED.

23
24 DATED: May 10, 2024

25 

26 Troy L. Nunley
27 United States District Judge