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15 Attorneys for Defendant
 AMAZON.COM SERVICES LLC

17 UNITED STATES DISTRICT COURT
 18 EASTERN DISTRICT OF CALIFORNIA

19
 20 LISA DAUGHTON, an individual,
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 Plaintiff,
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 vs.
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 AMAZON.COM SERVICES, LLC, a
 24 Delaware corporation; and DOES 1-10,
 inclusive,
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 Defendant.
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Case No. 2:23-cv-02977-KJM-CKD

**JOINT STIPULATION TO CONTINUE
 CERTAIN CASE DEADLINES AND
 ORDER**

LOCAL RULE 144

JOINT STIPULATION

Pursuant to Local Rule 144, Plaintiff Lisa Daughton (“Plaintiff”) and Defendant Amazon.com Services LLC (“Amazon”) (Plaintiff and Defendant collectively, the “Parties”) jointly stipulate to a request that the Court continue by up to 6 months the existing expert discovery, fact discovery, and dispositive motion deadlines, based upon the following good cause:

WHEREAS, the Parties have been diligently engaged in discovery, including providing initial and supplemental disclosures, written discovery, production of documents, and are currently meeting and conferring on depositions of Plaintiff and Amazon employees;

WHEREAS, the Parties have also had preliminary discussions regarding potential informal resolution;

WHEREAS, counsel for Plaintiff recently assumed responsibility for this matter from another attorney in his office and has requested a 6-month extension of the expert and fact discovery deadlines to allow him time to get up speed on this matter and assess next steps in discovery, which will aid in the Parties’ discussions on potential informal resolution;

WHEREAS, counsel for Amazon is agreeable to the requested extension and believes extending the dispositive motion deadline by six months would also be warranted if the expert and fact discovery deadlines are continued; and

WHEREAS, this is the Parties’ first request for a continuance of the pretrial dates in this matter; and

WHEREAS, while the Parties are requesting a six-month continuance of certain deadlines, if the Court is not amenable to an extension of that length, they would request an extension of at least four months of the deadlines noted below, for the reasons noted above.

THEREFORE, the Parties respectfully request that the Court make the following modifications to the Pretrial Scheduling Order:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Initial Expert Disclosure	November 15, 2024	May 15, 2025
Rebuttal Expert Disclosure	December 6, 2024	June 6, 2025

1	Fact Discovery Cut-Off	January 10, 2025	July 10, 2025
2	Expert Discovery Cut-Off	January 10, 2025	July 10, 2025
3	L/D to File Dispositive Motions	April 10, 2025	October 10, 2025

4 Dated: September 24, 2024

MAKAREM & ASSOCIATES

6 By /s/ Aidan McGlaze

Aidan McGlaze
Attorney for Plaintiff
LISA DAUGHTON

8 Dated: September 24, 2024

MORGAN, LEWIS & BOCKIUS LLP

10 By /s/ Brian D. Fahy

Brian D. Fahy
Ryan S. Malhan
Attorneys for Defendant
AMAZON.COM SERVICES LLC

12 **SIGNATURE ATTESTATION**

13 I hereby attest that all signatories listed above, on whose behalf this stipulation is
14 submitted, concur in the filing's content and have authorized the filing.
15

16 Dated: September 24, 2024

MORGAN, LEWIS & BOCKIUS LLP

18 By /s/ Brian D. Fahy

Brian D. Fahy
Ryan S. Malhan
Attorneys for Defendant
AMAZON.COM SERVICES LLC

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ORDER

Based upon the Parties' Joint Stipulation to Extend Case Deadlines, and for good cause having been shown, the Current Pretrial Scheduling Order at ECF No. 10 is modified as requested by the parties above.

IT IS SO ORDERED.

Dated: September 24, 2024


UNITED STATES DISTRICT JUDGE