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 TOYISHA CULVER

15 UNITED STATES DISTRICT COURT  
 16 EASTERN DISTRICT OF CALIFORNIA,  
 17 SACRAMENTO DIVISION

19 TOYISHA CULVER,  
 20 Plaintiff,  
 21 vs.  
 22 AMAZON.COM SERVICES LLC,  
 23 Defendant.

Case No. 2:24-cv-00622-JAM-AC

**STIPULATION AND ORDER TO  
 CONTINUE TRIAL DATE AND  
 PRETRIAL DEADLINES**

The Hon. John A. Mendez

Action Filed: November 29, 2023  
 Trial Date: October 20, 2025  
 Proposed Trial Date: January 20, 2025

1 Plaintiff Toyisha Culver (“Plaintiff”) and Defendant AMAZON.COM  
2 SERVICES LLC (“Defendant”) (collectively, the “Parties”), by and through their  
3 undersigned counsel of record, hereby respectfully submit this Joint Stipulation for  
4 good cause continuing all pre-trial deadlines by 90 days.

5 WHEREAS, the Parties are currently engaging in settlement discussions that  
6 appear to have strong potential to resolve the instant action;

7 WHEREAS, the Parties seek to focus their time and resources on these  
8 discussions, and have concerns that not doing so could undermine the possibility of  
9 resolution at this juncture;

10 WHEREAS, should settlement discussions not resolve the matter in the  
11 coming weeks, the Parties will proceed with completing discovery;

12 WHEREAS, the Parties have not requested any previous trial extensions;

13 WHEREAS, the current schedule includes the following pre-trial deadlines:

- 14 - Discovery cut-off: February 28, 2025
- 15 - File MSJ /dispositive motions: April 25, 2025
- 16 - Final Pre-Trial Conference: August 29, 2025

17 ACCORDINGLY, the Parties respectfully request and stipulate that the Court  
18 continue the October 20, 2025 trial date to at January 20, 2026, and all pre-trial  
19 deadlines be extended by 90 days.

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**THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties through their counsel of record, subject to the Court’s approval, that:

The trial date be continued from October 20, 2025 to January 20, 2026.

That all pre-trial deadlines be extended by 90 days.

Dated: January 22, 2025 FARELLA BRAUN + MARTEL LLP

By:           /s/ Daniela A. Archila            
Daniela A. Archila

Attorneys for AMAZON.COM SERVICES  
LLC

Dated: January 22, 2025 ELKIN | GAMBOA, LLP

By:           /s/ Michael Elkin            
Michael Elkin, Esq.

Attorneys for Plaintiff Toyisha Culver

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**CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES**

I, Daniela A. Archila, am the ECF user whose identification and password are being used to file this Joint Stipulation to Continue Trial Date and Pre-Trial Deadlines for Good Cause. I hereby attest that I have obtained the concurrence of each signatory to this document.

Dated: January 22, 2025

FARELLA BRAUN + MARTEL LLP

By:           /s/ Daniela A. Archila            
Daniela A. Archila

Attorneys for AMAZON.COM SERVICES  
LLC

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**ORDER MODIFYING PRETRIAL SCHEDULING ORDER**

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

<b>Event</b>	<b>Date</b>
Discovery Cutoff	<b>05/30/2025</b>
Deadline to file dispositive motions	<b>07/25/2025</b>
Dispositive Motion Hearing	<b>09/23/2025, at 01:00 p.m.</b>
Final Pretrial Conference	<b>12/12/2025, at 11:00 a.m.</b>
Jury Trial (5-7 days)	<b>02/02/2026, at 09:00 a.m.</b>

All other instructions contained in the Pretrial Scheduling Order (ECF No. 5), entered on May 23, 2024, shall remain in effect.

IT IS SO ORDERED.

Dated: January 29, 2025

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE