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2 WHEREAS the trial date in this matter is currently set for April 17, 2017; WHEREAS the deadline for completion of all non-expert discovery is October 14, 2016; 3 WHEREAS Plaintiff's counsel recently propounded a substantial amount of discovery on 4 5 Defendants, which Defendants need additional time to respond to; WHEREAS the parties need additional time to conduct fact discovery; 6 7 WHEREAS the pleadings are not settled as the Court has not yet ruled on Defendants' 8 Motion to Dismiss Portions of Plaintiff's First Amended Complaint; WHEREAS the Court's ruling on Defendant's Motion to Dismiss may impact the 9 discoverable issues in this matter; 10 WHEREAS the parties would suffer prejudice if the fact discovery cut-off date is not 11 continued in light of the outstanding discovery needed; 12 WHEREAS extending the fact discovery cut-off date will not impact any of the other 13 deadlines in the Court's scheduling Order. 14 **STIPULATION** 15 THEREFORE, IT IS HEREBY STIUPLATED THAT the fact discovery cut-off deadline 16 in this matter is continued for approximately thirty (30) days from October 14, 2016, until 17 November 14, 2016. 18 19 **GORDON & REES LLP** Dated: August 16, 2016 20 /s/Jennifer M. Lynch 21 By: Alyson S. Cabrera Jennifer M. Lynch 22 Attorneys for Defendants 23 24 LEIGH LAW GROUP Dated: August 16, 2016 25 26 By: /s/Jay T. Jambeck Jay T. Jambeck Mandy Leigh 27 Attorneys for Plaintiff 28

RECITALS

[PROPOSED]-ORDER

It is hereby ordered that the fact discovery cut-off deadline in this matter is continued from October 14, 2016, until November 14, 2016.

IT IS SO ORDERED.

August 16, 2016



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