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Trans Net Freight, Ltd. and Mohammed Juned Amodwala

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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT, OAKLAND DIVISION

19 CARLOS ANTONIO PORRAS;
20 BRITTANY RIOS

21 Plaintiff,

22 v.

23 TRANS NET FREIGHT, LTD.;
24 MOHAMMED JUNED AMODWALA; and
DOES 1 to 60, inclusive,

25 Defendants.

Case No.: 4:16-cv-04677 HSG

**STIPULATION AND REQUEST FOR AN
ORDER MODIFYING CERTAIN PRE-
TRIAL DEADLINES AND ~~PROPOSED~~
ORDER**

Jury Trial: October 1, 2018
Time: 8:30 a.m.
Dept: Courtroom 2
Judge: Honorable Haywood S.
Gilliam, Jr.

1 Plaintiffs and Defendants, by and through their respective undersigned counsel of record,
2 hereby submit the following Stipulation and Proposed Order for the Court's consideration.

3 The parties request that the Court issue a few modifications to the current Scheduling Order.
4 The proposed and requested changes do not modify the Court's Pretrial Conference or the Trial
5 dates. Rather, the proposed changes modify only certain discovery deadlines.

6 The parties believe that good cause exists for the Court to modify the pretrial discovery
7 deadlines currently in place in this case. The original pretrial schedule was set with an
8 accommodation for possible dispositive motions. The parties have concluded that, based upon the
9 information known to date, they will not be bringing dispositive motions. Additionally, the parties
10 remain engaged in fact discovery, some of which has been complicated by the location of witnesses
11 in Canada. As such, the parties believe that the discovery dates can be modified so as to eliminate
12 the time for dispositive motions while allowing more time to complete discovery. The modification
13 of the deadlines will permit the parties to continue to move forward with discovery in this case, but
14 the modified dates will not effect the Court's dates for a pretrial conference or for trial.

15 As such, the parties propose and request the following changes:

	<u>Current Schedule</u>	<u>Proposed Schedule</u>
16 Completion of Fact Discovery:	March 23, 2018	June 29, 2018
17 Initial Expert Disclosures:	April 7, 2018	July 16, 2018
18 Rebuttal Expert Disclosures:	April 23, 2018	August 3, 2018
19 Completion of Expert Discovery:	May 7, 2018	August 17, 2018
20 Pretrial Conference:	September 18, 2018	Same
21 Jury Trial:	October 1, 2018	Same

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24 These proposed changes will allow the parties to complete discovery in a timely fashion
25 without disrupting the Pretrial Conference and Trial dates. The parties are available to discuss
26 these proposed changes if the Court wishes.

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Respectfully, submitted.

Dated: March 28, 2018

ANDERLINI & McSWEENEY LLP

By: /s/ G. Chris Andersen
G. Chris Andersen
PLAINTIFFS CARLOS ANTONIO PORRAS;
BRITTANYRIOS

Dated: March 28, 2018

FARMER CASE & FEDOR

By: /s/Anthony T. Case
Anthony T. Case, Esq.
Attorney for Counter-Defendant Carlos Porras

Dated: March 28, 2018

WILSON, ELSER, MOSKOWITZ, EDELMAN &
DICKER LLP

By: /s/ Francis Torrence
Francis Torrence
Attorneys for Defendants
TRANS NET FREIGHT, LTD.and
MOHAMMED JUNED AMODWALA

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PROPOSED ORDER

The Court having reviewed the parties' Stipulation, and good cause appearing, hereby modifies the current Scheduling Order in this case with the above proposed discovery related deadlines.

IT IS SO ORDERED.

Dated: March 28, 2018


UNITED STATES DISTRICT JUDGE