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 22 BAKER CONCRETE CONSTRUCTION, INC.

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17 JAMES HERNANDEZ  
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 19 Plaintiff,  
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 21 v.  
 22 BAKER CONCRETE  
 23 CONSTRUCTION, INC., a Ohio  
 24 Corporation,  
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 26 Defendants.

CASE NO.: 4:18-cv-03226-HSG  
 Assigned to Hon. Judge Haywood S.  
 Gilliam, Jr.

**STIPULATED SCHEDULING  
 ORDER**

Complaint Filed: May 30, 2018

1 The parties, James Hernandez (“Plaintiff”) and Baker Concrete Construction,  
 2 Inc. (“Defendant” or “Baker”), through undersigned counsel of record, hereby  
 3 propose the following Stipulated Scheduling Order:

4 **PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES**

<b>Matter</b>	<b>Deadline</b>	<b>Parties’ Request</b>
Last Day to Comply with General Order 71	Scheduling Conference Date Plus 38 days	<b>October 5, 2018</b>
Last Day to File Motions to Add Parties and Amend Pleadings	Scheduling Conference Date plus 60 Days	<b>October 29, 2018</b>
Last Day to Conduct Settlement Proceedings	Scheduling Conference Date plus 120 Days	<b>December 26, 2018</b>
Fact Discovery Cut-Off	18 weeks before the Final Pretrial Conference (“FPTC”)	<b>January 25, 2019</b>
Last Day to Serve Initial Expert Reports	16 weeks before the FPTC	<b>April 23, 2019</b>
Disposition Hearing Deadline (except <i>Daubert</i> and all other Motions in Limine)	16 weeks before the FPTC	<b>April 23, 2019</b>
Last Day to Serve Rebuttal Expert Reports	12 weeks before the FPTC	<b>May 21, 2019</b>
Expert Discovery Cut-Off	8 weeks before the FPTC	<b>June 18, 2019</b>
Last Day to File <i>Daubert</i> Motions	7 weeks before the FPTC	<b>June 25, 2019</b>

<b>Matter</b>	<b>Deadline</b>	<b>Parties' Request</b>
Last Day to File Motions in Limine (other than <i>Daubert</i> Motions)	4 weeks before the FPTC	<b>July 16, 2019</b>
Final Pre-Trial Conference	FPTC	<b>August 13, 2019</b>
Trial	Trial	<b>August 26, 2019</b>

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Dated: September 11, 2018

GORDON REES SCULLY MANSUKHANI

By: */s/ Marshall R. Lurtz* \_\_\_\_\_  
 Roger M. Mansukhani  
 Craig D. Nickerson  
 Marshall R. Lurtz  
 Attorneys for Defendant  
 Baker Concrete Construction, Inc.

Dated: September 11, 2018

McCormack and Erlich, LLP

By: */s/ Bryan J. McCormack* \_\_\_\_\_  
 Bryan J. McCormack  
 Attorneys for Plaintiff  
 James Hernandez

