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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

TAMARA EVANS, Plaintiff, **v.** **CALIFORNIA COMMISSION ON PEACE OFFICERS STANDARDS AND TRAINING; EDMUND PECINOVSKY; ANNE BREWER and DOES 1-25,** Defendants.	2:15-CV-01951-MCE-DB **STIPULATION AND ORDER TO EXTEND DISCOVERY DATES**

Pursuant to Local Rules 143 and 144, Plaintiff Tamara Evans and Defendants California Commission on Peace Officers Standards and Training, Anne Brewer, and Edmund Pecinovsky hereby stipulate to extend the discovery cutoff dates. Due to the elevation of the original magistrate judge assigned to this case, no scheduling conference was held and the parties did not participate in the assignation of discovery deadlines.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

There exists good cause to extend the discovery deadlines and modify the pre-trial order in accordance with FRCP 16. All parties agree that the current discovery schedule does not provide sufficient time. The parties agree to a 120-day extension of currently scheduled deadlines as set forth below. No trial date has been assigned in this case which has been reassigned twice. The parties believe that each will benefit from the extension and there will be no undue prejudice.

Although this case was originally filed on June 4, 2014, there was a dormant period where Plaintiff substituted counsel. A First Amended Complaint was filed on August 10, 2015.

Written discovery has been propounded. However, there exists a long standing dispute over the production of various documents as well as the contents from Plaintiff's laptop used during her employment. The parties have noticed depositions, but the depositions have been postponed due to health issues in plaintiff's family and the unresolved discovery issues. The parties hope that a discovery telephonic conference call with the court on September 28, 2016 at 2:30 p.m. will be productive.

No previous request to continue discovery deadlines has been made.

WHEREAS the court previously set October 17, 2016, as the deadline for fact discovery;

WHEREAS the court previously set December 19, 2016, as the deadline for expert discovery;

WHEREAS the court previously set April 20, 2017, as the deadline for hearing dispositive motions.

The parties do therefore Stipulate and agree as follows:

1. To extend Fact discovery cutoff until February 17, 2017;
2. To extend Designation of Experts deadline until April 19, 2017; and
3. That a Status and Setting Conference be set for a date convenient to the court to address remaining case calendar, including deadline for dispositive motions and assignment of trial.

Dated: September 21, 2016 BROWN POORE LLP

SCOTT A. BROWN
Attorneys for Plaintiff Tamara Evans

Dated: September 21, 2016 California Deputy Attorney General

CONNIE A. BROUSSARD
Attorneys for Defendants

I hereby attest that concurrence in the filing of the document has been obtained by all of the signatories.

Dated: September 21, 2016 BROWN POORE LLP

SCOTT A. BROWN
Attorneys for Plaintiff Tamara Evans

ORDER

Pursuant to the parties' stipulation, it is hereby ordered that the Court's Pretrial Scheduling Order (ECF No. 17) is modified as follows:

1. The fact discovery cutoff is extended until February 17, 2017;
2. The deadline to designate experts is extended until April 19, 2017; and
3. The last day to hear dispositive motions shall be August 24, 2017.

IT IS SO ORDERED.

Dated: September 29, 2016

MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE