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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

A.M., A MINOR, by and through her parent and legal representative, NICOLE MUMMA

Plaintiff,

v.

TODD MUMMA; and DOES 1-500,

Defendants.

Case No. 1:22-cv-00548-JLT-ECG

STIPULATION AND [~~PROPOSED~~] ORDER CONTINUING PRETRIAL DEADLINES

Hon. Jennifer L. Thurston

Trial Date: October 6, 2026

TO THE HONORABLE COURT:

Plaintiff A.M. ("Plaintiff") and Defendant Todd Mumma ("Defendant"), by and through their respective undersigned counsel, hereby stipulate and agree as follows.

RECITALS

1. The parties have agreed on the amount Defendant would pay to settle this action. They continue to negotiate the remaining terms, which include the scope of the release, the timing and mechanics of payment, the security for payment, the confidentiality provisions, and the

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disposition of the funds retained under the Court's February 17, 2026, order (Doc. 62).

2. The parties agreed on that amount in a separate writing exchanged between counsel, a copy of which each counsel has. The amount is confidential. It is not disclosed in this Stipulation, and the parties do not ask the Court to review or approve it.

3. Because the remaining terms are unresolved, no complete settlement of this action presently exists.

4. Several pretrial deadlines under the Final Pretrial Order (Doc. 80), as modified by the Court's September 8, 2026, order (Doc. 87), fall before the parties can complete their negotiations. Preparing motions in limine, jury instructions, and a verdict form during that same period would consume substantial resources that may prove unnecessary. Good cause therefore exists for a short continuance.

5. This request is not made for the purpose of delay. No party seeks to continue the trial date, the exhibit deadlines, or the settlement conference, and the relief requested does not affect them.

THE PARTIES STIPULATE AND AGREE, AS BETWEEN THEMSELVES:

A. Agreement as to Amount. The amount of any settlement of this action is the amount the parties agreed upon in that separate writing. Neither party shall assert, propose, or contend in any negotiation, communication, motion, or proceeding that a different amount was agreed or is required. This Stipulation is a writing signed by authorized counsel for each party, and it is intended to be, and is, binding on the parties as to the amount. The parties' agreement as to the amount is binding notwithstanding that other terms remain open, and no disagreement over any remaining term entitles either party to revisit it.

B. Remaining Terms; Duration. The parties shall negotiate the remaining terms in good faith and with reasonable diligence. Paragraph A binds each party unless and until that party gives the other written notice that it is terminating settlement negotiations, and it binds each party. This Stipulation does not itself settle this action, and if the parties do not agree on the remaining terms, the action proceeds on the schedule the Court sets.

C. Confidentiality. Neither party nor counsel shall disclose that amount except to that

party's professional advisors, as compelled by law, or as necessary to enforce Paragraph A. Any filing that would disclose the amount shall be submitted with a request to seal.

D. No Admission; No Waiver. Nothing in this Stipulation is an admission of liability, of damages, or of any fact, and nothing in it waives any claim, defense, objection, or evidentiary position of either party.

THE PARTIES FURTHER STIPULATE, AND JOINTLY REQUEST THAT THE COURT ORDER:

6. The Final Pretrial Order (Doc. 80), as modified by the Court's September 8, 2026, order (Doc. 87), request it be further modified solely as to the deadlines set forth in the table below.

Deadline	Current Date	Proposed New Date
Filing of motions in limine	Sept. 11, 2026	Sept. 18, 2026
Oppositions to motions in limine	Sept. 17, 2026	Sept. 22, 2026
Service of proposed jury instructions and verdict form on opposing counsel	Sept. 11, 2026	Sept. 18, 2026
Filing and lodging of agreed-upon and disputed jury instructions and verdict forms	Sept. 18, 2026	Sept. 25, 2026
Filing of proposed voir dire questions	Sept. 18, 2026	Unchanged
Trial briefs, if any	Sept. 25, 2026	Unchanged
Exhibit binders to the Clerk and opposing counsel	Oct. 1, 2026	Unchanged
Settlement conference	Sept. 15, 2026	Unchanged
Jury trial	Oct. 6, 2026	Unchanged

7. No deadline other than those identified in the table is affected. The trial date of October 6, 2026 remains as set.

8. If the parties file a stipulation for dismissal of this action before any continued deadline, that deadline is vacated as to both parties without further order.

9. This Stipulation may be executed in counterparts, and a facsimile or PDF signature shall be deemed an original signature for all purposes.

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10. Undersigned counsel certify that they are authorized to enter into this Stipulation, on behalf of their respective clients, and that each client's consent was given knowingly and voluntarily.

IT IS SO STIPULATED.

Dated: September 10, 2026

LAW OFFICE OF KEVIN G. LITTLE

By: */s/Kevin G. Little*
Kevin G. Little
Attorneys for Plaintiff A.M.

Dated: September 10, 2026

SARABIAN LAW, A.P.C.

By: */s/Jacob Sarabian*
Jacob Sarabian
Attorneys for Defendant Todd Mumma

[~~PROPOSED~~] ORDER

The above Stipulation is APPROVED. The Final Pretrial Order (Doc. 80), as modified by the Court's order of September 8, 2026 (Doc. 87), is further modified as follows:

1. Motions in limine shall be filed no later than September 18, 2026. Any opposition shall be served and filed no later than September 22, 2026.

2. The parties shall serve their proposed jury instructions and verdict form on one another no later than September 18, 2026, and shall file and lodge the agreed-upon and disputed jury instructions and verdict forms no later than September 25, 2026.

3. All other dates and deadlines remain UNCHANGED, including the filing of proposed voir dire questions on September 18, 2026, the trial brief deadline of September 25, 2026, the exhibit binder deadline of October 1, 2026, the settlement conference of September 15, 2026, and the trial date of October 6, 2026.

IT IS SO ORDERED.

Dated: September 11, 2026

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE