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CORPORATION dba AMTRAK  
8

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION  
11

12 BARBARA MARTIN,  
13 Plaintiff,  
14 v.  
15 NATIONAL RAILROAD PASSENGER  
CORPORATION, and DOES 1 TO 10,  
16 Defendants.  
17

Case No. 2:12-cv-01979 KJN

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

18 The parties to this action, by and through their respective counsel, hereby stipulate to the  
19 following amended discovery dates. This stipulation shall not affect the pre-trial conference and  
20 trial dates.

21 1) The deadline for expert disclosures shall be extended from February 18, 2013 to  
22 April 18, 2013.

23 2) The deadline for rebuttal expert disclosures shall be extended from March 18,  
24 2013 to May 17, 2013.

25 3) The date for completion of non-expert discovery shall be extended from April 30,  
26 2013 to June 28, 2013.

27 4) The date for completion of expert discovery shall be extended from June 14, 2013  
28 to July 1, 2013.

1 Good cause exists for the requested extended discovery dates because the parties require  
2 additional time to subpoena medical records and engage in discovery in order to engage in  
3 meaningful settlement negotiations and mediation. This stipulation will not affect the pre-trial  
4 conference date of October 3, 2013 or the trial date of October 21, 2013.

5  
6 Dated: February 15, 2013

CURTIS LEGAL GROUP

7 By: /s/ Paul R. Scheele  
8 PAUL R. SCHEELE  
9 Attorney for Plaintiff,  
10 BARBARA MARTIN

11  
12 Dated: February 15, 2013

LOMBARDI, LOPER & CONANT, LLP

13 By: /s/ Kara Abelson  
14 KARA ABELSON  
15 Attorney for Defendant,  
16 NATIONAL RAILROAD PASSENGER  
17 CORPORATION

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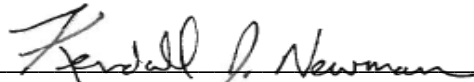
**ORDER**

The Stipulation to Extend Discovery Deadlines having been presented to the Court, and good cause appearing therefore, it is hereby ordered as follows:

1. The deadline for expert disclosures shall be extended from February 18, 2013, to April 18, 2013.
- 2) The deadline for rebuttal expert disclosures shall be extended from March 18, 2013, to May 17, 2013.
- 3) The date for completion of non-expert discovery shall be extended from April 30, 2013, to June 28, 2013.
- 4) The date for completion of expert discovery shall be extended from June 14, 2013, to July 1, 2013.

IT IS SO ORDERED.

**Date: 2/19/2013**

  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE

KJN/mso