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18 Attorneys for Defendants  
19 LKQ FOSTER AUTO PARTS, INC.  
20 LKQ CORPORATION, INC.

21 Attorney for Defendants

22 UNITED STATES DISTRICT COURT  
23 EASTERN DISTRICT OF CALIFORNIA  
24 SACRAMENTO DIVISION

25 SHLANDA JOHNSON,

26 Plaintiff,

27 v.

28 LKQ FOSTER AUTO PARTS, INC., LKQ  
CORPORATION, INC., and DOES 1  
through 50, inclusive,

Defendants.

CASE NO. 2:15-cv-02413-KJM-AC

**JOINT STIPULATION AND ORDER  
FOR THIRTY-FIVE DAY  
CONTINUANCE OF SUMMARY  
JUDGMENT AND DISCOVERY CUT-  
OFF DEADLINES WHILE PARTIES  
ENGAGE IN MEDIATION**

Complaint Filed: November 19, 2015  
Trial Date: May 7, 2018

1 IT IS HEREBY STIPULATED by and between Plaintiff SHLANDA JOHNSON  
2 (“Plaintiff”) and Defendant LKQ FOSTER AUTO PARTS, INC. (“Defendant”) that  
3 GOOD CAUSE exists for an additional thirty-five (35) day extension of time, until  
4 December 8, 2017, for Defendant and Plaintiff to e-file any dispositive motion and  
5 supporting papers pursuant to Federal Rule of Civil Procedure 56. The Parties have  
6 agreed to attend mediation, and, therefore, believe that continuing the dispositive motion  
7 deadline by thirty-five days will facilitate the Parties’ ability to attend mediation and  
8 permit the Parties to devote their respective efforts towards settlement.

9 Moreover, because the Parties are hereby stipulating to a thirty-five day extension  
10 of time, until December 8, 2017, for Defendant and Plaintiff to file and serve any  
11 dispositive motion and supporting papers, the Parties further stipulate that responding  
12 party’s deadline to respond to any dispositive motion shall likewise be extended, to  
13 December 22, 2017, and the moving party’s deadline to reply, if any, shall be extended  
14 until January 5, 2018 (extended because of Christmas and New Year’s holidays).

15 The Parties further stipulate to extend discovery cut-off in this case by a period of  
16 thirty days, to January 17, 2018, in order to further facilitate settlement and progress at  
17 mediation.  
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19 Finally, Counsel for Plaintiff wishes to apprise the Court that, should the case not  
20 resolve at mediation, Plaintiff’s counsel will be seeking a 45-day trial continuance due to  
21 pregnancy. Counsel is presently due March 2, 2018, and should the case not resolve,  
22 respectfully requests a 45-day trial continuance in order to be able to return to work from  
23 maternity leave and properly prepare for trial in the event the case does not resolve at  
24 mediation or is not disposed of on summary judgment. Counsel for Defendant does not  
25 oppose this request should Plaintiff make it.  
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**IT IS SO STIPULATED:**

Dated: October 30, 2017

Counsel for Plaintiff:

**THE FIGARI LAW FIRM**

/s/ Barbara E. Figari

BARBARA E. FIGARI, ESQ.  
Attorney for Plaintiff

Dated: October 30, 2017

Counsel for Defendant

**FISHER & PHILLIPS LLP**

/s/ Jason Keck, Esq.

By: JASON KECK, ESQ.  
Attorney for Defendant

**ORDER**

The parties jointly request (ECF No. 67) to amend dates in the amended status (pretrial scheduling) order (ECF No. 50). Good cause appearing, the court GRANTS this request. In light of the parties' request, the court will hold defendant's motion to stay (ECF No. 56) in abeyance pending a report from the parties regarding the outcome of their mediation attempts.

Description	Existing Date	New Date
Discovery Cutoff	December 15, 2017	January 17, 2018
Expert Disclosures	December 15, 2017	January 17, 2018
Supplemental Expert Disclosures	January 5, 2018	February 7, 2018
Completion of Expert Discovery	January 19, 2018	February 21, 2018
All Dispositive Motions Hearing Date	December 4, 2017 (ECF Nos. 65-66)	December 8, 2017 (filed); December 22, 2017 (response); January 5, 2018 (reply). <b>Heard by January 12, 2018.</b>
File Joint Pretrial Conference Statement	March 2, 2018	VACATED to be reset as needed.
Final Pretrial Conference	March 23, 2018	VACATED to be reset as needed.
Trial Briefs Due	April 23, 2018	VACATED to be reset as needed.
Trial	May 7, 2018	VACATED to be reset as needed.

This amendment does not alter any other portions of the amended status (pretrial scheduling) order (ECF No. 50).

IT IS SO ORDERED.

DATED: November 3, 2017.



UNITED STATES DISTRICT JUDGE