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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CORY HILLIS, an individual,

Plaintiff,

vs.

OWENS-BROCKWAY GLASS CONTAINER, INC., a Delaware corporation; and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:23-cv-02629-TLN-CKD

Honorable Troy L. Nunley
Courtroom 2, 15th Floor

STIPULATION TO MODIFY SCHEDULING ORDER; ORDER

Action filed: April 4, 2023
Action removed: November 13, 2023
Discovery Cutoff: March 6, 2026
Trial Date: None set

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

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CONTAINER, INC.

Plaintiff CORY HILLIS and Defendant OWENS-BROCKWAY GLASS CONTAINER, INC. (collectively "the Parties") hereby stipulate as follows:

(1) On April 4, 2023, Plaintiff initiated this wage and hour action in the Superior Court of the State of California for the County of San Joaquin.[1]

(2) On November 9, 2023, Defendant filed an answer to Plaintiff's complaint.

(3) On November 13, 2023, Defendant removed the action to the United States District Court, Eastern District of California. Dkt. 1.

(4) On November 28, 2023, the Court issued its Initial Pretrial Scheduling Order. Dkt. 7.

(5) On January 2, 2024, the Court issued an Amended Pretrial Scheduling Order. Dkt. 11.

(6) On July 31, 2024, January 22, 2025, and February 20, 2025, in response to Plaintiff's written discovery requests, Defendant produced wage and hour policies and Plaintiff's personnel file and time and payroll records in three separate productions.

(7) On October 24, 2025, the Court issued a Supplemental Pretrial Scheduling Order. Dkt. 18, setting the following pretrial schedule:

a.	Discovery Cutoff (Fact):	March 6, 2026
b.	Expert Disclosures:	April 6, 2026
c.	Rebuttal Expert Disclosures:	May 6, 2026
d.	Supp Disclosures [Rule 26(e)]:	August 3, 2026
e.	Discovery Cutoff (Experts):	September 2, 2026
f.	Dispositive Motions:	September 2, 2026
g.	Joint Notice of Trial Readiness:	October 2, 2026

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[1] Plaintiff initially filed the action as a class and PAGA representative action. In or about July of 2024, Plaintiff resolved to pursue only his individual Labor Code claims, including failure to provide compliant meal and rest breaks, to pay wages for all hours worked due to rounding of time entries, to provide accurate wage statements, and to pay all earned wages upon termination.

(8) On February 4, 2026, Plaintiff served on Defendant a Notice of Deposition of Defendant pursuant to FRCP 30(b)(6), noticed for February 20, 2026, seeking testimony regarding Defendant's meal break policies, rest break policies, timekeeping policies, and payroll policies during the period of April 4, 2019 to April 30, 2022 ("PMK Deposition").

(9) On February 4, 2026, Defendant served on Plaintiff a Notice of Deposition of Plaintiff Cory Hillis, noticed for February 27, 2026 ("Plaintiff's Deposition").

(10) On February 4, 2026, Defendant served on Plaintiff Requests for Production (Set 1) and Interrogatories (Set 1), the responses to which are due on March 6, 2026 ("Defendant's Discovery").

(11) Because the Parties have been unable to proceed with the PMK Deposition and the Plaintiff's Deposition on the originally-noticed dates due to scheduling conflicts, and because Plaintiff's responses to Defendant's Discovery are due on the cutoff date for fact discovery (March 6, 2026), the Parties agree that extending the discovery cutoff date and expert disclosure dates by approximately **45 days** is in the interest of justice and will promote judicial efficiency. The Parties have been diligently meeting and conferring regarding potential deposition dates, and are endeavoring to find mutually convenient dates.

(12) The Parties have not previously requested an extension of the pretrial schedule.

(13) Accordingly, the Parties STIPULATE AND AGREE to revise the pretrial schedule as follows:

a.	Discovery Cutoff (Fact):	~~March 6, 2026~~ → April 17, 2026
b.	Expert Disclosures:	~~April 6, 2026~~ → May 22, 2026
c.	Rebuttal Expert Disclosures:	~~May 6, 2026~~ → June 18, 2026
d.	Supp Disclosures [Rule 26(e)]:	August 3, 2026 (no change)
e.	Discovery Cutoff (Experts):	September 2, 2026 (no change)
f.	Dispositive Motions:	September 2, 2026 (no change)
g.	Joint Notice of Trial Readiness:	October 2, 2026 (no change)

(14) In the event that the Court declines to so extend the pretrial schedule, the Parties STIPULATE AND AGREE that the PMK Deposition and the Plaintiff's Deposition will proceed on or before March 6, 2026.

IT IS SO STIPULATED.

Dated: February 26, 2026

MATERN LAW GROUP, PC

By: */s/ Mikael H. Stahle*
MATTHEW J. MATERN
MIKAEL H. STAHLE

Attorneys for Plaintiff
CORY HILLIS

Dated: February 26, 2026

SEYFARTH SHAW LLP

By: */s/ Robin E. Devaux*
ROBIN E. DEVAUX
BRIAN P. LONG

Attorneys for Defendant
OWENS-BROCKWAY GLASS CONTAINER, INC.

IT IS SO ORDERED.

Dated: February 26, 2026

Troy L. Nunley
Chief United States District Judge