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SUPERIOR COURT - STOCKTON

2016 MAR 28 PM 3:51

ROSA JUNGUEIRO, CLERK

BY *Rita L. Gomez*

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17 SAN JOAQUIN COUNTY MOSQUITO AND
18 VECTOR CONTROL DISTRICT

19 STATE OF CALIFORNIA
20 COUNTY OF SAN JOAQUIN

21 MICHELLE MORGAN,

22 Plaintiff,

23 v.

24 SAN JOAQUIN COUNTY MOSQUITO AND
25 VECTOR CONTROL DISTRICT and DOES 1
26 through 50, inclusive,

27 Defendants.

6831
Case No. 39-2014-00313386-CU-OE-STK

[ASSIGNED FOR ALL PURPOSES TO
THE HONORABLE LINDA LOFTHUS]

JOINT STIPULATION FOR ORDER
TO RESCHEDULE TRIAL DATE AND
ASSOCIATED DEADLINES

Complaint Filed: July 10, 2014
Trial Date: July 18, 2016

BY FAX

28 TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD:

The Parties to the above-captioned matter (the "Action"), Plaintiff MICHELLE MORGAN ("Plaintiff") and Defendant SAN JOAQUIN MOSQUITO VECTOR CONTROL DISTRICT ("Defendant") (collectively referred to herein as "the Parties"), by and through their

1
JOINT STIPULATION FOR ORDER TO RESCHEDULE TRIAL DATE
AND ASSOCIATED DEADLINES

MAR 23 2016

1 respective counsel of record, hereby stipulate, agree and submit this joint request. The Parties
2 request that the trial date, currently set for July 18, 2016, be rescheduled to October 17, 2016.

3 The Parties have agreed to engage in mediation to attempt to resolve this Action and avoid
4 trial and related dispositive motions. Defendant anticipates filing a summary judgment motion
5 and engaging in further discovery. To allow for the possibility of a successful mediation, these
6 actions can be delayed with a trial continuance. The Parties have scheduled mediation for May 9,
7 2016 with mediator Dan Quinn. Currently, the mandatory settlement conference is also set for
8 May 9, 2016. Plaintiff currently resides out of state and is scheduled to be in Stockton for the
9 settlement conference. The Parties, therefore, jointly request that the trial date be rescheduled for
10 October 17, 2016. Furthermore, the Parties request that the mandatory settlement conference be
11 rescheduled to August 8, 2016, or thereabouts, and all remaining deadlines, including those for
12 discovery and dispositive motions, be recalculated according to the new trial date. The basis of
13 the Parties' request is for the efficiency of the Parties and the Court.

14 Date: March 22, 2016

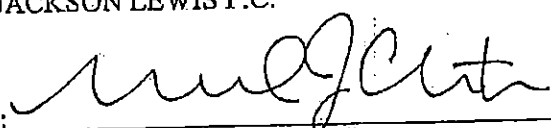
LAW OFFICES OF CORREN & CORREN

15
16 By: 
17 ADAM BLAIR CORRENT

18 Attorneys for Plaintiff
19 MICHELLE MORGAN

20 Date: March 21, 2016

JACKSON LEWIS P.C.

21
22 By: 
23 MICHAEL J. CHRISTIAN
24 SHANE R. LARSEN

25 Attorneys for Defendant
26 SAN JOAQUIN COUNTY MOSQUITO VECTOR
27 CONTROL DISTRICT
28

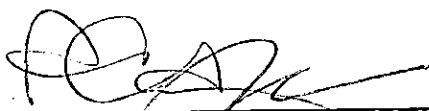
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ORDER

Pursuant to the foregoing Stipulation, and otherwise finding good cause therefore, the Court hereby orders that the trial date for this Action be rescheduled to October 17, 2016. It is further ordered that the mandatory settlement conference is rescheduled for August 8, 2016. All pre-trial deadlines, including those for dispositive motions and discovery, are to be calculated from the new trial date of October 17, 2016. At 1:30 P.M.
at 10:00 AM

IT IS SO ORDERED.

Date: 3-28-16



HON. JUDGE OF THE SUPERIOR COURT
F Clark Sueyres

1 **PROOF OF SERVICE**

2 I, the undersigned declare:

3 I am employed in the County of Sacramento, State of California. I am over the
4 age of eighteen years and not a party to the within action; my business address is 400 Capitol
5 Mall, Suite 1600, Sacramento, California 95814.

6 On the date set forth below, I served the within:

7 **JOINT STIPULATION FOR ORDER TO RESCHEDULE**
8 **TRIAL DATE AND ASSOCIATED DEADLINES**

9 on the parties below:

10 by personally delivering a true and correct copy thereof to the person at the address set
11 forth below, in accordance with Code of Civil Procedure section 1011(a).

12 ✓ by placing a true and correct copy thereof enclosed in a sealed envelope with postage
13 thereon fully prepaid for deposit in the United States Post Office mail box, at my business
14 address shown above, following Jackson Lewis LLP's ordinary business practices for the
15 collection and processing of mail, of which I am readily familiar, and addressed as set
16 forth below. On the same day correspondence is placed for collection and mailing, it is
17 deposited in the ordinary course of business with the United States Postal Service.

18 by depositing a true and correct copy thereof enclosed in a sealed envelope with delivery
19 fees thereon fully prepaid in a box or other facility regularly maintained by NORCO
20 Overnight Delivery or delivering to an authorized courier or driver authorized by NORCO
21 Overnight Delivery to receive documents, addressed as set forth below.

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25 I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct, and that this declaration was executed on March 23, 2016, at
27 Sacramento, California.

28 
Noreen Witt