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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GINA CARANO,

Plaintiff,

v.

THE WALT DISNEY COMPANY,  
LUCASFILM LTD. LLC; and  
HUCKLEBERRY INDUSTRIES (US)  
INC.,

Defendants.

Case No.: 2:24-CV-01009-SPG-SK

**STIPULATED REQUEST TO  
EXTEND PRETRIAL AND  
TRIAL SCHEDULE**

Judge: Hon. Sherilyn Peace Garnett  
Magistrate Judge: Steve Kim

Courtroom: 5C

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Civil Local Rule 16-14, and Judge Garnett’s Procedures, Plaintiff Gina Carano and Defendants The Walt Disney Company, Lucasfilm Ltd. LLC, and Huckleberry Industries (US) Inc. (jointly, the “Parties”) hereby submit this stipulated request for an order extending the pretrial and trial schedule, as follows:

WHEREAS, on August 14, 2024, this Court entered an Order establishing a pretrial and trial schedule in this case (ECF No. 56-1);

WHEREAS, the Parties have diligently and in good faith been conducting fact discovery, which has been both extensive and cooperative: the Parties have served and responded to interrogatories, requests for admission, and hundreds of document requests; engaged in numerous meet-and-confer discussions over various discovery issues; and each has produced nearly ten thousand pages of documents to date with additional documents due to be produced in the coming weeks;

WHEREAS, fact discovery has taken longer than originally anticipated for the Parties to complete, in part due to their working cooperatively to resolve various

1 discovery issues and limit those that may require the Court’s intervention, some of  
2 which affect documents and information related to anticipated expert testimony;

3 WHEREAS, once document production is sufficiently complete, the Parties  
4 will need time to coordinate the setting of depositions, with the Parties collectively  
5 having identified more than a dozen potential deposition witnesses already;

6 WHEREAS, the requested modified schedule, which includes an  
7 approximate 130-day extension of discovery and expert witness disclosures, and  
8 additional extensions of motion and trial dates, allows additional time for the  
9 Parties to produce and review agreed upon documents, resolve the few issues still  
10 in dispute, and account for the schedules of the proposed deponents and counsel,  
11 which includes some third-party witnesses and respective counsel;

12 WHEREAS, the Parties agree that good cause exists to extend the pretrial  
13 and trial schedule for the reasons established in the accompanying declaration of  
14 Gene C. Schaerr;

15 WHEREAS, the Parties agree that no prejudice would result if the case  
16 deadlines are continued;

17 WHEREAS, this is the Parties’ first request to modify the case schedule set  
18 forth in the Court’s August 14, 2024 scheduling order (ECF No. 56-1);

19 NOW THEREFORE, the Parties hereby stipulate and agree that, subject to  
20 the approval and availability of the Court, the pretrial and trial schedule is extended  
21 as follows:  
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Case Event	Deadline/Hearing Date Set in ECF No. 56-1	Parties' Requested Modified Deadline
Fact Discovery Cut-Off	04/18/2025	08/29/2025
Expert Disclosure (Initial)	04/11/2025	07/18/2025
Expert Disclosure (Rebuttal)	05/11/2025	08/15/2025
Expert Discovery Cut-Off	06/02/2025	09/15/2025
Last Date to Hear Motions	06/11/2025	10/29/2025
Last Date to Hear <i>Daubert</i> Motions	07/16/2025	11/26/2025
Deadline to Complete Settlement Conference	07/15/2025	12/17/2025
Trial Filings (first round)	08/13/2025	12/16/2025
Trial Filings (second round)	08/27/2025	01/07/2026
Final Pretrial Conference	09/10/2025	01/21/2026
Jury Trial	09/29/2025	02/19/2026

**IT IS SO STIPULATED.**

DATED: February 27, 2025

SCHAERR | JAFFE LLP

By: /s/ Gene C. Schaerr

Gene C. Schaerr

*Counsel for Plaintiff*

DATED: February 27, 2025

O'MELVENY & MYERS LLP

By: /s/ Molly M. Lens

Molly M. Lens

*Counsel for Defendants*

1                   **ATTESTATION RE ELECTRONIC SIGNATURES**

2                   The filer of this document attests that all other signatories to this document,  
3 on whose behalf this filing is submitted, concur as to the content and have  
4 authorized their signature and filing of the document.

5 DATED: February 27, 2025

6   SCHAERR | JAFFE LLP

7   By: /s/ Gene C. Schaerr  
8   Gene C. Schaerr

9   *Counsel for Plaintiff*

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**JUDGE SHERILYN PEACE GARNETT**  
**SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET**

*Please complete this worksheet jointly and file it with your Joint Rule 26(f) Report.  
 The Court **ORDERS** the parties to make every effort to agree on dates.*

<b>Case No.</b> 2:24-cv-01009-SPG-SK		<b>Case Name:</b> Carano v. The Walt Disney Company, et al.	
Trial and Final Pretrial Conference Dates		Parties' Joint Date mm/dd/yyyy	Court Order
Check one: <input checked="" type="checkbox"/> Jury Trial or <input type="checkbox"/> Court Trial <input type="checkbox"/> Magistrate Judge <b>(Tuesday at 8:30 a.m., within 12 months of Scheduling Conference)</b> Estimated Duration: 5 Days		02/19/2026	<input type="checkbox"/> Jury Trial <input type="checkbox"/> Court Trial
Final Pretrial Conference ("FPTC") [L.R. 16] <b>(Wednesday at 3:00 p.m., at least 18 days before trial)</b>		01/21/2026	
Event <sup>1</sup> <b>Note:</b> Hearings shall be on <b>Wednesday</b> at 1:30pm Other dates can be any day of the week		Weeks Before FPTC <sup>2</sup>	Parties' Joint Date mm/dd/yyyy
Last Date to <u>Hear</u> Motion to Amend Pleadings / Add Parties [Wednesday]		24	12/20/2024
Fact Discovery Cut-Off (No later than deadline for filing dispositive motion)		18	08/29/2025
Expert Disclosure (Initial)		16	07/18/2025
Expert Disclosure (Rebuttal)		14	08/15/2025
Expert Discovery Cut-Off		13	09/15/2025
Last Date to <u>Hear</u> Motions <sup>3</sup> • Motions due at least 4 weeks before hearing; • Opposition due at least 3 weeks before hearing; • Reply due at least 2 weeks before hearing.		12	10/29/2025
Last Date to <u>Hear</u> <i>Daubert</i> Motions		8	11/26/2025
Deadline to Complete Settlement Conference [L.R. 16-15] Select one: <input type="checkbox"/> 1. Magistrate Judge (with Court approval) <input type="checkbox"/> 2. Court's Mediation Panel <input checked="" type="checkbox"/> 3. Private Mediation		5	12/17/2025  <input type="checkbox"/> 1. Mag. J. <input type="checkbox"/> 2. Panel <input type="checkbox"/> 3. Private
<b>Trial Filings (first round)</b> • Motions <i>In Limine</i> (except <i>Daubert</i> ) • Memoranda of Contentions of Fact and Law [L.R. 16-4] • Witness Lists [L.R. 16-5] • Joint Exhibit List [L.R. 16-6.1] • Joint Status Report Regarding Settlement • Proposed Findings of Fact and Conclusions of Law [L.R. 52] (court trial only) • Declarations containing Direct Testimony, if ordered (court trial only)		4	12/16/2026
<b>Trial Filings (second round)</b> • Oppositions to Motions in Limine • Joint Proposed Final Pretrial Conference Order [L.R. 16-7] • Joint/Agreed Proposed Jury Instructions (jury trial only) • Disputed Proposed Jury Instructions (jury trial only) • Joint Proposed Verdict Forms (jury trial only) • Joint Proposed Statement of the Case (jury trial only) • Proposed Additional Voir Dire Questions, if any (jury trial only) • Evidentiary Objections to Declarations. of Direct Testimony (court trial only)		2	01/07/2026

<sup>1</sup> Once issued, this "schedule may be modified only for good cause and with the judge's consent." Fed. R. Civ. P. 16(b)4).

<sup>2</sup> The numbers below represent the Court's recommended timeline. The parties may propose alternate dates based on the needs of each individual case. Class Actions and ERISA cases may need to vary from the above.

<sup>3</sup> Before filing Rule 56 motions, parties must review and comply with the Court's Standing Order for MSJ, which sets forth the briefing schedule and specific requirements for joint briefing and filing such motions.