

**UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA**

John Ireland v. Flowserve Corp., Flowserve US Inc., and Does 1 to 10

Ireland · No. 2:24-CV-01663-DJC-JDP · Decided June 16, 2025

SUMMARY

This document is a stipulated request and order in a federal civil case to extend the fact-discovery deadline. The court approved the parties' first request and extended the deadline from its prior date to August 29, 2025, while leaving expert-discovery, motion, and trial deadlines unchanged.

OPINION

1 JKaenveilnle P J.. LSeaeh o(Sutraiate (SBtaart eN Boa. r2 9N6o3. 4235)3 699) 2 JACKSON
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FLOWSERVE US INC. 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT 10 11
JOHN IRELAND, Case No. 2:24-CV-01663-DJC-JDP 12 Plaintiff, 13 STIPULATION AND
ORDER TO v. EXTEND DISCOVERY SCHEDULING 14 ORDER DEADLINES
FLOWSERVE CORP, FLOWSERVE US 15 INC. and Does 1 to 10, (FIRST REQUEST) 16
Defendants.

Complaint Filed: 04/03/2024 17 Trial Date: 06/01/2026 18 Plaintiff John Ireland ("Plaintiff"), by
and through his counsel of record and Defendants 19 Flowserve Corporation and Flowserve US,
Inc. ("Defendants"), by and through their counsel of 20 record, hereby stipulate and agree to
extend the unexpired discovery deadlines for 59 days to 21 August 29, 2025.

This is the parties' first request for an extension of the discovery deadline. 22 1. Discovery
Completed to Date 23 To date, the parties have completed their FRCP 26(f) conference and have
made exchanged 24 initial disclosures pursuant FRCP 26(a)(1). 25 2. Discovery Which Still
Needs to Occur 26 The parties have exchanged written discovery, but significant discovery
remains to be 27 completed in this matter.

Plaintiff is seeking to depose key witnesses including managers and/or 28 1 well as the person(s)
most qualified for ESI for Defendants. Defendants are seeking to depose 2 Plaintiff and other key
witnesses, including but not limited to, those bearing upon Plaintiff's claims 3 and damages in this
matter.

The parties have been diligently attempting to resolve and previously 4 agreed to engage in mediation with mediator Mark LeHocky. 5 The parties do not anticipate needing additional time to identify and prepare expert 6 witnesses, exchange expert reports, and conduct expert depositions. 7 3. Proposed Schedule for Completing Remaining Discovery 8 The parties propose extending the deadline to complete fact discovery to August 29, 2025.

9 All other deadlines pertaining to expert discovery and motions shall remain the same per the 10 Court's Scheduling Order. Trial is currently scheduled for June 1, 2026. 11 4. Good Cause Supports the Request to Extend the Deadline as Set Forth Herein 12 When a stipulation requires the modification of the scheduling order, the parties must first 13 satisfy the "good cause" standard established by Rule 16(b).

See Johnson v. Mammoth 14 Recreations, Inc., 975 F.2d 604, 608 (9th Cir. 1992); see also Fed. R. Civ. P. 16(b)(4) ("A schedule 15 may be modified only for good cause and with the judge's consent"). The good cause inquiry is 16 focused on the movant's reasons for seeking to modify the scheduling order and primarily 17 considers the movant's diligence.

In re W. States Wholesale Nat. Gas Antitrust Litig., 715 F.3d 18 716, 737 (9th Cir. 2013). The key determination is whether the subject deadline "cannot reasonably 19 be met despite the diligence of the party seeking the extension." Johnson, 975 F.2d at 609. 20 Good cause supports the parties' request to extend the Fact Discovery deadline.

The parties 21 have been diligent in pursuing discovery since the case's removal to federal court, including 22 holding their FRCP 26(f) conference, exchanging initial disclosures, and exchanging initial written 23 discovery.

However, the parties need additional time to complete percipient witness depositions 24 in this matter. 25 By entering into this Stipulation, the Parties are not waiving any rights or objections they 26 may have regarding any other party's anticipated or actual discovery activities or conceding that 27 any such discovery is proper or necessary. Nonetheless, they are entering into this stipulation in 28 1 The Parties hereby stipulate to the aforementioned.

2 3 Dated: June 11, 2025 HENRY LACEY 4 By /s/ Stephen Henry 5 STEPHEN F. HENRY Attorney for Plaintiff 6 7 8 9 Dated: June 13, 2025 JACKSON LEWIS P.C. 10 By: /s/ Kevin P. Lee Janelle J. Sahouria 11 Kevin P. Lee JACKSON LEWIS P.C. 12 Attorneys for Defendants FLOWSERVE CORP. and FLOWSERVE US INC. 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 1 ORDER 2 The parties deadline to complete fact discovery is hereby extended to August 29, 2025.

All 3 other deadlines pertaining to expert discovery and motions shall remain the same per the Court's 4 Scheduling Order. 5 IT IS SO ORDERED: 6 7 Dated: June 13, 2025 /s/ Daniel J.

Calabretta THE HONORABLE DANIEL J. CALABRETTA 8 UNITED STATES DISTRICT
JUDGE 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

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