

**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

OPINION

Ireland v. Flowserve Corp.

PER CURIAM.

1 JKaenveilnle P J.. LSeaeh o(Sutraiate (SBtaart eN Boa. r2 9N6o3. 4235)3 699) 2 JACKSON
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mail: Kevin.Lee@jacksonlewis.com 6 Attorneys for Defendants FLOWSERVE CORP. and 7
FLOWSERVE US INC. 8

UNITED STATES DISTRICT COURT

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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 19 reasonably be met despite the diligence of the party seeking the extension." *Johnson*, 975 F.2d 20 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 23 initial written discovery. However, the parties need additional time to complete percipient 24 witness depositions in this matter. 25 By entering into this Stipulation, the Parties are not 26 waiving any rights or objections they may have regarding any other party's anticipated or 27 actual discovery activities or conceding that any such discovery is proper or necessary. 28 Nonetheless, they are entering into this stipulation in 1 The Parties hereby stipulate to the 2 aforementioned. 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

UNITED STATES DISTRICT JUDGE

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