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Attorneys for Plaintiffs  
Ted Gaylord and Sheri Gaylord, as  
individuals and dba J&T Cattle Company

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION**

TED GAYLORD and SHERI GAYLORD, as  
individuals and dba J&T CATTLE COMPANY,

Plaintiffs,  
vs.

NATIONWIDE MUTUAL INSURANCE  
COMPANY, et al.,

Defendants.

**No. 1:10-CV-00620-AWI-MJS**

**SECOND STIPULATION TO CONTINUE  
DISCOVERY DEADLINES AND ORDER**

Plaintiffs Ted Gaylord and Sheri Gaylord, as individuals and dba J&T Cattle Company (collectively "Plaintiffs"), and Defendants Nationwide Mutual Insurance Company, AMCO Insurance Company and Allied Group, Inc. (collectively "Defendants"), hereby submit the following Second Stipulation and request for Order continuing the discovery deadlines in the above-reference case in light of the Court's recent continuation of the January 24, 2011 hearing on Defendants' Motion for Summary Judgment or in the Alternative for Partial Summary Judgment, to February 22, 2011.

The Court previously granted the parties' November 24, 2009 stipulation and request for order continuing the discovery deadlines in order to enable the parties to have a summary judgment motion heard prior to concluding discovery. The parties thereby sought to minimize issues for discovery and the time and expense associated with the same depending on the results of the summary judgment motion. The instant request for stipulation and order continuing discovery deadlines has been

necessitated by the Court's recent thirty (30) day continuance of Defendants motion for summary judgment. No other Court-ordered dates or dispositive motion dates will be impacted by this stipulation. Accordingly, the present stipulation will serve the interests of justice and judicial economy.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendants, through their respective counsel of record that the discovery deadlines in this case shall be continued thirty (30) days as follows:

Non Expert Discovery: From March 11, 2011 to **April 11, 2011**

Expert Disclosures: From March 18, 2011 to **April 18, 2011**

Supplemental Expert Disclosure: From April 1, 2011 to **May 2, 2011**

Non-Dispositive Pre-Trial Motions From April 8, 2011 to **May 9, 2011**

Non-Dispositive Pre-Trial Motion Hearing Date From May 9, 2011 to **June 8, 2011**

Expert Witness Discovery Cut-Off From May 11, 2011 to **June 10, 2011**

Dispositive Motion Deadline Remains March 11, 2011

IT IS SO STIPULATED.

DATED: February 2, 2011

DAMRELL, NELSON, SCHRIMP,  
PALLIOS, PACHER & SILVA

By: /s/ George P. Rodarakis  
Roger M. Schrimp  
George P. Rodarakis  
Attorneys for Plaintiffs

DATED: February 2, 2011

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

By: /s/ Lisa S. Passalacqua  
Thomas M. Herlihy  
John Burnite  
Lisa S. Passalacqua  
Attorneys for Defendants

1 IT IS SO ORDERED.  
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3 Dated: February 2, 2011  
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/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE  
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