

1 MARJIE D. BARROWS (SBN 122129)
 2 KATHLEEN M. DeLANEY (SBN 196376)
FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
 2000 Powell Street, Suite 900
 3 Emeryville, CA 94608
 Telephone: (510) 740-1500
 4 Facsimile: (510) 740-1501
 E-mail: mbarrows@fgppr.com
 5 E-mail: kdelaney@fgppr.com

6 Attorneys for Defendant THE AMERICAN
 INSURANCE COMPANY

7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

11 THE MEAT MARKET, INC., dba
 STATE CENTER FOODS,

12 Plaintiff,

13 vs.

14 THE AMERICAN INSURANCE
 15 COMPANY and DOES 1 through 50,
 inclusive,

16 Defendants.

No. 1:11-CV-00983-AWI DLB

**STIPULATION TO CONTINUE
 DEADLINES TO DISCLOSE
 EXPERTS AND TO FILE
 DISPOSITIVE MOTIONS;
 ORDER THEREON**

Trial Date: December 2, 2012

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC

ATTORNEYS AT LAW
 2000 POWELL STREET, SUITE 900
 EMERYVILLE, CALIFORNIA 94608
 (510) 740-1500

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2 TO THE HONORABLE DENNIS L. BECK, UNITED STATES DISTRICT COURT
3 MAGISTRATE JUDGE:

4 **STIPULATION**

5 WHEREAS, Plaintiff THE MEAT MARKET, INC. and Defendant THE
6 AMERICAN INSURANCE COMPANY desire to continue the parties' last day to disclose
7 expert witnesses and supplemental expert witnesses, and the parties' last day to file
8 dispositive motions, on the following grounds:

9 1. Counsel for both parties have worked diligently and amicably to complete
10 written discovery and schedule percipient depositions, but depositions and a site inspection
11 are not yet complete;

12 2. Thus, counsel find that they cannot meet the existing deadlines for the
13 parties' disclosure of expert witnesses and supplemental expert witnesses, and for the
14 filing of dispositive motions;

15 3. The parties have scheduled the completion of percipient depositions and a
16 site inspection by July 20, 2012; and

17 4. This would be the first continuance of the dispositive motion deadline and
18 the second extension of the expert witness disclosure deadline in this matter.

19 NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff
20 THE MEAT MARKET, INC. and Defendant THE AMERICAN INSURANCE
21 COMPANY hereby stipulate to the following:

22 1. The last day for the parties to disclose expert witnesses with reports is
23 continued to August 3, 2012;

24 2. The last day for the parties to disclose supplemental expert witnesses
25 with reports is continued to August 17, 2012;

26 3. The last day for the parties to file dispositive motions is continued to
27 August 10, 2012; and

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4. The last day for dispositive motions to be heard is continued to September 17, 2012.

DATED: June 15, 2012

**FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC**

By: /s/ Kathleen M. DeLaney
Marjie D. Barrows
Kathleen M. DeLaney

Attorneys for Defendant
**THE AMERICAN INSURANCE
COMPANY**

DATED: June 15, 2012, 2012

HOPPE LAW GROUP

By: /s/ Barbara J. Rueger
Theodore W. Hoppe
Barbara J. Rueger

Attorneys for Plaintiff
**THE MEAT MARKET, INC., dba STATE
CENTER FOODS**

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ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, as follows:

1. The last day for the parties to disclose expert witnesses with reports is continued to August 3, 2012;
2. The last day for the parties to disclose supplemental expert witnesses with reports is continued to August 17, 2012;
3. The last day for the parties to file dispositive motions is continued to August 10, 2012; and
4. The last day for dispositive motions to be heard is continued to September 17, 2012.

IT IS SO ORDERED.

Dated: June 19, 2012

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE