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Attorneys for Plaintiff
GOLDEN MEMORIAL
INSURANCE SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GOLDEN MEMORIAL INSURANCE
SERVICES, INC., a California corporation,

Plaintiff,

vs.

SECURED SERENITY, INC., a California
corporation, GOLDEN MEMORIAL
COMPANIES, INC., a California corporation,
GOLDEN MEMORIAL PLAN, INC., a
California corporation, LAURO HERRERA, an
Individual, ROBERT PAUL "BO" CLARK, JR.,
an Individual, GUADALUPE "JOE"
GONZALEZ, an Individual AND DOES 1-10
INCLUSIVE,

Defendants.

) Case No: 1:11-cv-01058-LJO-BAM

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) **STIPULATION AND ORDER**

) **CONTINUING EXPERT**

) **DISCLOSURE DEADLINE**

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Pursuant to Local Rules 6-2 and 7-12, Plaintiff, Golden Memorial Insurance Services,
Inc. ("Plaintiff") and Defendants Secured Serenity, Inc., a California corporation, Golden
Memorial Companies, Inc., a California corporation, Golden Memorial Plan, Inc., a California
corporation, Lauro Herrera, an Individual, and Guadalupe "Joe" Gonzalez, an Individual
(collectively, "Defendants") for good cause pursuant to Federal Rules of Civil Procedure, Rule

1 16(b)(4), hereby request continuation of the scheduled expert disclosures exchange date from
2 December 3, 2012 to January 4, 2013. In support of such request, the parties state as follows:

3 There is significant outstanding discovery to be conducted by both parties, including nine
4 (9) sets of discovery requests from Defendants that remain outstanding, and an additional three
5 30(b)(6) depositions scheduled from December 10th through December 12th, 2012; a third party
6 witness deposition which has been postponed, a deposition of the owner of Golden Memorial
7 scheduled for December 13, 2012, and the deposition of a Golden Memorial employee scheduled
8 for December 14, 2012.

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10 On or about October 31, 2012, Plaintiff settled in principle its case against Robert Paul
11 “Bo” Clark and filed a Stipulated Dismissal with Prejudice of Defendant Clark on November 26,
12 2012.

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14 Currently there are active discussions regarding further settlements, and further
15 resolutions are expected shortly.

16 With the foregoing significant developments in this case, and the anticipated settlement,
17 the parties ask that the expert exchange be continued to January 4, 2013.
18 The trial date is not until May 2013, and this is the first request for a change in the expert
19 disclosure deadline.

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1 **NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

2 The expert disclosure cutoff of December 3, 2012 is continued until January 4, 2013 to
3 provide ample time to complete outstanding discovery matters or alternatively, to conclude
4 settlement with remaining parties to this matter.

5 Dated: November 26, 2012

LARIVIERE, GRUBMAN & PAYNE, LLP

7 By: /s/ Christopher J. Passarelli
8 Christopher J. Passarelli
9 Attorneys for Plaintiff

10 Dated: November 26, 2012

TINGLEY PIONTKOWSKI LLP

11 By: /s/ Bruce Piontkowski
12 Bruce Piontkowski
13 Attorneys for Defendants

14 **ORDER**

15 Upon reviewing the Stipulation and for good cause being shown, **IT IS HEREBY**
16 **ORDERED** that expert witness disclosures by any party, including supplemental expert witness
17 disclosures by any party, shall be served no later than January 4, 2013. This extension of time to
18 complete expert disclosures does not alter the date of any event or deadline already fixed by the
19 Court's scheduling order.

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23 IT IS SO ORDERED.

24 Dated: November 28, 2012

/s/ Barbara A. McAuliffe
25 UNITED STATES MAGISTRATE JUDGE
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