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GREBEN & ASSOCIATES

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Attorneys for Plaintiffs GARY COPPOLA, an individual; GARY COPPOLA, as SUCCESSOR TRUSTEE OF THE VIOLA M. COPPOLA IRREVOCABLE TRUST; and GARY COPPOLA, as TRUSTEE OF THE ANTHONY M. COPPOLA TRUST

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

GARY COPPOLA, an individual, GARY COPPOLA, as SUCCESSOR TRUSTEE OF THE VIOLA M. COPPOLA IRREVOCABLE TRUST; and GARY COPPOLA, as TRUSTEE OF THE ANTHONY M. COPPOLA TRUST;

Plaintiffs,

v.

PARAGON CLEANERS (formerly sued as GREGORY SMITH, an individual); et al.

Defendants.

Case No.: 1:11-CV-01257-AWI-BAM

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING EXTENDING DEADLINES SET FORTH IN THE COURT'S SCHEDULING ORDER

RELATED CROSS AND COUNTER-CLAIMS

This stipulation is made by and between Plaintiffs Gary Coppola, Gary Coppola as successor trustee of the Viola M. Coppola Irrevocable Trust, and Gary Coppola as trustee of the Anthony M. Coppola Trust; Defendant Richard Laster; Defendant Paragon Cleaners, Inc.; Defendants the Jane Higgins Nash Trust, Jane Nash as Executor of the Estate of Decatur Higgins AKA the Estate of Mabel Elaine Higgins, Nash Properties LLC, David H. Nash and Richard P. Nash as the successor trustees of the Jane Nash Trust, a trust created under the terms of the Last Will and Testament of

1 Mabel Elaine Higgins, formerly known as the Mabel Elaine Higgins Testamentary Trust and
2 commonly known as the Jane Higgins Nash Trust; as well as Defendant California Water Service
3 Company; Defendant City of Visalia; Defendant Martin and Martin Properties LLC; and Defendant
4 Visalia Unified School District (collectively "Parties").

5 The Parties hereby agree and stipulate to extend certain deadlines set forth in the Court's
6 Scheduling Order, and the stipulated order on certain expert deadlines [Documents 320 and 374] as
7 follows. All other deadlines remain unchanged. The Parties stipulate in good faith, following the
8 hearing on April 21, 2016, and request that the Court adopt this modified schedule.

- 9 - Coppola's fact discovery cut-off against the City, only, currently scheduled for June 1,
10 2016, shall be moved to June 22, 2016.
- 11 - Initial Expert Witness Disclosures, currently scheduled for June 24, 2016, shall be moved
12 to July 13, 2016.
- 13 - Supplemental Expert Witness Disclosures, currently scheduled for July 22, 2016, shall be
14 moved to August 18, 2016.
- 15 - The close of expert discovery, currently scheduled to close on September 16, 2016, shall
16 be extended to September 23, 2016.

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18 Dated: April 26, 2016

GREBEN & ASSOCIATES

19
20 /s/ Jan A. Greben

21 Jan A. Greben
22 Christine M. Monroe
23 Attorneys for Plaintiffs and Counter Defendants
24 GARY COPPOLA, an individual; GARY
25 COPPOLA, as SUCCESSOR TRUSTEE OF
26 THE VIOLA M. COPPOLA IRREVOCABLE
27 TRUST; and GARY COPPOLA, as TRUSTEE
28 OF THE ANTHONY M. COPPOLA TRUST

Dated: April 26, 2016

GUALCO LAW

1 (Authorized on: 4/22/2016)

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/s/ Lori J. Gualco

3

Lori J. Gualco
Attorney for Defendant RICHARD LASTER

4

5

Dated: April 26, 2016

GUALCO LAW

6

7 (Authorized on: 4/22/2016)

8

/s/ Lori J. Gualco

9

Lori J. Gualco
Attorney for Defendant PARAGON
CLEANERS, INC.

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11

12

13 Dated: April 26, 2016

WILLIAMS, BRODERSEN & PRITCHETT
LLP

14

(Authorized on: 4/22/2016)

15

/s/ Steven R. Williams

16

Steven R. Williams
Attorney for Defendants THE JANE HIGGINS
NASH TRUST; JANE NASH, as EXECUTOR
OF THE ESTATE OF DECATUR HIGGINS
AKA THE ESTATE OF MABEL ELAINE
HIGGINS; NASH PROPERTIES, LLC; and
DAVID H. NASH, and RICHARD P. NASH, as
the SUCCESSOR TRUSTEES OF THE JANE
NASH TRUST, a trust created under the terms of
the Last Will and Testament of Mabel Elaine
Higgins, formerly known as the Mabel Elaine
Higgins Testamentary Trust and commonly
known as the Jane Higgins Nash Trust

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28 Dated: April 26, 2016

WOOD, SMITH, HENNING & BERMAN LLP

(Authorized on: 4/22/2016)

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/s/ Patrick S. Schoenburg

David F. Wood
Patrick S. Schoenburg
Attorneys for Defendant CALIFORNIA
WATER SERVICE COMPANY

Dated: April 26, 2016
(Authorized on: 4/22/2016)

HERR, PEDERSEN & BERGLUND LLP

/s/ Leonard C. Herr

Leonard C. Herr
Ron Statler
Attorneys for Defendant CITY OF VISALIA

Dated: April 26, 2016
(Authorized on:4/22/2016)

ALLEN, MATKINS, LECK, GAMBLE,
MALLORY & NATSIS LLP

/s/ Tim C. Hsu

Emily L. Murray
Tim C. Hsu
Attorneys for Defendant MARTIN AND
MARTIN PROPERTIES, LLC

Dated: April 26, 2016
(Authorized on: 4/22/2016)

NELSON & ROZIER

/s/ Clayton Christenson

John L. Rozier
Clayton Christenson
Attorneys for Defendant VISALIA UNIFIED
SCHOOL DISTRICT

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ORDER

IT IS SO ORDERED.

Dated: April 26, 2016

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE