

**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  
EXTENDING CLOSE OF EXPERT  
DISCOVERY DEADLINE**

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 Mabel Elaine Higgins, formerly known as the Mabel Elaine

1 Higgins Testamentary Trust and commonly known as the Jane Higgins Nash Trust; as well as  
2 Defendant City of Visalia (collectively “Parties”).

3 The Parties hereby stipulate to extend the expert discovery cut-off date, currently scheduled  
4 for September 23, 2016, to October 5, 2016. All other deadlines shall remain the same.

5 The Parties respectfully request that the Court grant this short extension of the close of expert  
6 discovery set forth in the Court’s Scheduling Order, and the stipulated orders on certain expert  
7 deadlines [Documents 320, 374, 398, and 423] to consolidate the deadlines in this case with those in  
8 the Mission Linen Case<sup>1</sup>. All but one of the remaining parties are counsel in both the Coppola and  
9 Mission Linen cases, which have similar factual and technical issues. Good cause exists because  
10 counsel in the Mission Linen case were required to meet and confer on deadlines because trial was  
11 recently re-set per the Court’s calendar and the parties have reached the same agreement and wish to  
12 combine the depositions of overlapping experts in the interest of conserving resources. No other  
13 deadlines will be affected or modified as a result of this stipulation.

14  
15 Dated: August 4, 2016

GREBEN & ASSOCIATES

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17 /s/ Jan A. Greben

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Jan A. Greben

19 Christine M. Monroe

20 Attorneys for Plaintiffs and Counter Defendants

21 GARY COPPOLA, an individual; GARY

22 COPPOLA, as SUCCESSOR TRUSTEE OF

THE VIOLA M. COPPOLA IRREVOCABLE

TRUST; and GARY COPPOLA, as TRUSTEE

OF THE ANTHONY M. COPPOLA TRUST

23 Dated: August 4, 2016

GUALCO LAW

24 (Authorized on 8/4/2016)

25 /s/ Lori J. Gualco

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Lori J. Gualco

27 Attorney for Defendant RICHARD LASTER

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<sup>1</sup> *Mission Linen Supply v. City of Visalia*, Case No. 1:15-cv-00672-AWI-EPG

1 Dated: August 4, 2016

GUALCO LAW

2 (Authorized on 8/4/2016)

3 /s/ Lori J. Gualco

4 \_\_\_\_\_  
Lori J. Gualco  
Attorney for Defendant PARAGON  
5 CLEANERS, INC.

6  
7 Dated: August 4, 2016

WILLIAMS, BRODERSEN & PRITCHETT  
8 LLP

9 (Authorized on 8/4/2016)

10 /s/ Steven R. Williams

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

18 Dated: August 8, 2016

HERR, PEDERSEN & BERGLUND LLP

19 (Authorized on 8/8/2016)

20 /s/ Leonard C. Herr

21 \_\_\_\_\_  
Leonard C. Herr  
22 Ron Statler  
Attorneys for Defendant CITY OF VISALIA

23  
24 **IT IS SO ORDERED.**

25 Dated: August 9, 2016

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

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