

1 **GREBEN & ASSOCIATES**

125 E. DE LA GUERRA ST., STE 203
SANTA BARBARA, CA 93101
TEL: 805-963-9090
FAX: 805-963-9098

Jan A. Greben, SBN 103464
jan@grebenlaw.com
Christine M. Monroe, SBN 304573
christine@grebenlaw.com

Attorneys for Plaintiffs and Counter Defendants 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, INC. (formerly sued as GREGORY SMITH, an individual); et al.

Defendants.

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

STIPULATION AND [PROPOSED] ORDER REGARDING FURTHER MEDIATION AND STATUS CONFERENCE DEADLINES and ORDER RESETTING STATUS CONFERENCE TO APRIL 24, 2017

On March 13, 2017, the parties filed the following stipulation:

This stipulation and proposed order is made by and between Gary Coppola, Gary Coppola as successor trustee of the Viola M. Coppola Irrevocable Trust, Gary Coppola as trustee of the Anthony M. Coppola Trust, Paragon Cleaners, Inc., Richard Laster, the Estate of Decatur Higgins, the Estate of Mabel Elaine Higgins, Nash Properties LLC, David H. Nash as successor co-trustee of the Jane Nash Trust, Richard P. Nash as successor co-trustee of the Jane Nash Trust, and the City of Visalia (collectively referred to herein as "the Parties").

1 Whereas, on January 24, 2017, the Court entered an Order staying the case and ordering the
2 parties to mediation with neutral, Timothy Gallagher. [Document 457.]

3 Whereas, consistent with the Order [Document 457] the Parties have participated in
4 mediation sessions with Mr. Gallagher and have made progress, but have not yet reached a
5 settlement.

6 Whereas, the Parties have a further status conference with the Court on April 17, 2017. A
7 joint status report is to be filed on April 10, 2017 in advance of the status conference. [Document
8 457.]

9 Whereas, the Parties and Mr. Gallagher have agreed that an additional mediation session is
10 necessary to bring this matter to conclusion and to compel the personal attendance by the Court of
11 each of the Parties' carriers with authority to settle the case to attend and participate in such session
12 at Mr. Gallagher's office located at 1875 Century Park East, Los Angeles, California, scheduled for
13 a reserved date of April 13, 2017 at 9 a.m. for this matter.

14 The Parties hereby stipulate and agree that a further settlement/mediation conference be set
15 for April 13, 2017 with mediator, Timothy Gallagher, at his office in Los Angeles, California. The
16 Parties further request that the Court require counsel and the Parties' insurers with settlement
17 authority to attend such settlement/mediation conference in person.

18 The Parties further stipulate, and respectfully request that the Court extend the deadline to
19 file a joint status report until after the settlement conference, to April 14, 2017.

20
21 Date: March 13, 2017

GREBEN & ASSOCIATES

22
23 /s/ Jan A. Greben

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

1 Date: March 13, 2017
2 (per authorization)

GUALCO LAW

3 /s/ Lori J. Gualco

Lori J. Gualco

4 Attorney for Defendant RICHARD LASTER

5 Date: March 13, 2017
6 (per authorization)

GUALCO LAW

7 /s/ Lori J. Gualco

Lori J. Gualco

8 Attorney for Defendant PARAGON CLEANERS,
9 INC.

10 Date: March 13, 2017
11 (per authorization)

HERR, PEDERSEN & BERGLUND LLP

12 /s/ Leonard C. Herr

Leonard C. Herr

13 Attorneys for Defendant CITY OF VISALIA
14

15 Date: March 14, 2017
16 (per authorization)

WILLIAMS, BRODERSEN & PRITCHETT LLP

17 /s/ Steven R. Williams

Steven R. Williams

18 Attorney for Defendants THE ESTATE OF
19 DECATUR HIGGINS, deceased; THE ESTATE
20 OF MABEL ELAINE HIGGINS, deceased; NASH
21 PROPERTIES, LLC; DAVID H. NASH, as the
22 SUCCESSOR CO-TRUSTEE OF THE JANE
23 NASH TRUST, a trust treated under the terms of
24 the Last Will and Testament Of Mabel Elaine
25 Higgins, formerly known as the Mabel Elaine
26 Higgins Testamentary Trust and commonly known
27 as the Jane Higgins Nash Trust; and RICHARD P.
28 NASH, as the SUCCESSOR CO-TRUSTEE 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

