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17 Attorney Plaintiffs, FRISCO HONNEVK and
18 BOUALAI VONGPHACHANH

19 UNITED STATES DISTRICT COURT
20 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

21 FRISCO HONNEVK, BOUALAI
22 VONGPHACHANH,
23 Plaintiffs,
24 vs.
25 FARMERS NEW WORLD LIFE
26 INSURANCE COMPANY,
27 Defendant.

28 CASE NO. 1:11 CV 01531 AWI DLB
**STIPULATION TO EXTEND
DISCOVERY CUT OFF**

Trial Date: March 13, 2013

**TO THE CLERK OF THE ABOVE ENTITLED COURT AND TO THE
PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:**

1 COMES NOW, plaintiffs, FRISCO HONNEVK, BOUALAI VONGPHACHANH,
2 and defendant, FARMERS NEW WORLD LIFE INSURANCE COMPANY, and each of
3 them, by and between their respective attorneys of record, hereby stipulate to (1) continue the
4 September 28, 2012, expert designation deadline to **November 2, 2012**, (2) continue the
5 September 30, 2012, non-expert discovery cut off date to **November 2, 2012**, and (3)
6 continue the November 15, 2012 expert discovery cut off date to **November 30, 2012**.

7 This Stipulation is entered into in good faith and not for the purpose of delay, as set
8 forth below.

9 **1. FACTS SUPPORTING STIPULATION**

10 This stipulation is premised upon an agreement by and between plaintiffs and
11 defendant to further explore settlement alternatives before concluding discovery. Given the
12 approaching September 30, 2012, non-expert discovery cut off date, and since trial is not until
13 March 13, 2013, the parties have agreed to discuss settlement options and alternatives and
14 seriously consider any reasonable settlement demand made by plaintiffs. One previous
15 request for an extension has been granted.

16 **2. STIPULATION**

17 Based on the foregoing, the parties hereby stipulate to (1) continue the existing expert
18 designation deadline to **November 2, 2012**; (2) continue the September 30, 2012, non-expert
19 discovery cut off to **November 2, 2012**; and (3) continue the November 15, 2012, expert
20 discovery cut off to **November 30, 2012**.

21
22 **IT IS SO STIPULATED.**

23 DATED: September 28, 2012

MURCHISON & CUMMING, LLP

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26 Bv: /s/ _____
27 William D. Naeve
28 Attorneys for Defendant,
FARMERS NEW WORLD LIFE
INSURANCE COMPANY

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DATED: September 28, 2012 TIMOTHY I. MARKS & ASSOCIATES

By: /s/ _____
Timothy I. Marks
Attorneys for Plaintiffs
FRISCO HONNEVK and BOUALAI
VONGPHACHANH

ORDER

Based upon the foregoing and GOOD CAUSE APPEARING THEREFOR,

IT IS SO ORDERED:

Expert designation deadline in this litigation is continued from September 28, 2012, to **November 2, 2012**. Non-expert discovery cut off is continued from September 30, 2012, to **November 2, 2012**. Expert discovery cut off is continued from November 15, 2012, to **November 30, 2012**.

IT IS SO ORDERED.

Dated: October 9, 2012

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE