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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

PACIFIC MARINE CENTER, INC., a
California corporation, and SONA
VARTANIAN, an individual,

Plaintiffs,

v.

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
Pennsylvania corporation, and DOES
1 through 10, inclusive,

Defendants.

Case No. 1:13-CV-00992-AWI-SKO

**STIPULATION AND ORDER RE
DISCOVERY CUT-OFF AND
AMENDMENT OF SCHEDULING
ORDER**

WHEREAS, Defendant Philadelphia Indemnity Insurance Company (“Defendant”) requested that the discovery cutoff and other deadline dates set forth in the case Scheduling Order be continued in order to allow Defendant to obtain comprehensive document production prior to taking depositions and because of discovery time lost due to a medical condition of Defendant’s counsel;

WHEREAS, following an informal mid-discovery status conference on September 23, 2014, in which the parties, Plaintiffs Pacific Marine Center, Inc. and Sona Vartanian (“Plaintiffs”) and Defendant, appeared by and through their counsel of record before the Honorable Sheila K. Oberto, United States Magistrate Judge,

1 the parties were directed to meet and confer to determine whether they could
2 stipulate to an extension of the scheduling dates in this matter;

3 WHEREAS, after meeting and conferring, the counsel for Plaintiffs
4 graciously agreed to a four month extension of the scheduling dates;

5 NOW, THEREFORE, it is hereby stipulated by Plaintiffs and Defendant, by
6 and through their respective counsel of record, as follows:

7
8 1. The various deadline, pre-trial and trial dates currently set shall be
9 continued four months to the following dates, or such other dates in reasonable
10 proximity thereto convenient to the Court's schedule, as follows:

11 Non Expert Discovery cutoff: April 13, 2015.

12 Expert Disclosure: April 10, 2015.

13 Supplemental Expert Disclosure: April 24, 2015.

14 Expert Discovery cutoff: May 20, 2015.

15 Settlement Conference: May 14, 2015, at 10:00 a.m., Courtroom 9.

16 Non Dispositive Motions:

17 Filing: May 28, 2015.

18 Hearing: June 25, 2015.

19 Dispositive Motions:

20 Filing: May 28, 2015.

21 Hearing: July 2, 2015.

22 Pre-Trial Conference: August 10, 2015, at 8:30 a.m., Courtroom 2.

23 Trial: September 15, 2015, at 8:30 a.m., Courtroom 2.

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25 2. The Case Scheduling Order, dated November 26, 2013, shall be
26 amended to reflect the new dates.

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IT IS SO STIPULATED.

DATED: September 29, 2014

CHARLSTON, REVICH & WOLLITZ LLP
BRUCE T. SMYTH

By: /s/Bruce T. Smyth
Bruce T. Smyth
Attorneys for Defendant,
Philadelphia Indemnity Insurance Company

DATED: September 29, 2014

THE REICH LAW FIRM
JEFF REICH

By: /s/ Jeff Reich
Jeff Reich
Attorneys for Plaintiffs,
Pacific Marine Center, Inc. and Sona
Vartanian
A copy of this page signed by Mr. Reich is
attached on the next page.

ORDER

Pursuant to the parties' stipulation and for good cause, the schedule is modified as set forth below. The parties' proposed filing and hearing deadlines for dispositive and non-dispositive motions have been adjusted slightly to accommodate Judge Ishii and Judge Oberto's law and motion schedule:

- Non Expert Discovery cutoff: April 13, 2015
- Expert Disclosure: April 10, 2015
- Supplemental Expert Disclosure: April 24, 2015
- Expert Discovery cutoff: May 20, 2015

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Settlement Conference: May 14, 2015, 10:00 a.m., Ctrm 9
Non Dispositive Motion Filing: May 27, 2015
Non Dispositive Motion Hearing: June 24, 2015
Dispositive Motion Filing: May 27, 2015
Dispositive Motion Hearing: July 6, 2015
Pre-Trial Conference: August 10, 2015, 8:30 a.m., Ctrm 2
Trial: September 15, 2015, 8:30 a.m., Ctrm 2

IT IS SO ORDERED.

Dated: October 2, 2014

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE