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

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

Plaintiff,

vs.

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

Defendant.

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

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

WHEREAS, that the parties through their counsel have mutually agreed to request that the discovery cutoff and other deadline dates set forth in the case original Scheduling Order and Order Amending Scheduling Order be continued in order to allow additional time for completing depositions and other discovery, while accommodating the respective schedules of counsel;

WHEREAS, the parties have met and conferred regarding discovery and will meet further regarding the respective schedules of counsel in this matter, because the parties would like to provide for more time to allow the necessary remaining discovery to be conducted while accommodating the schedules of counsel. The continuance of discovery cut-off dates would allow this to be accomplished. The parties believe that such extension is advantageous to both parties

1 and allows for the best use of time and resources.

2 WHEREAS, after meeting and conferring, the counsel have agreed to approximate two
3 month extensions of the scheduling dates;

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

6 1. The various deadlines for discovery and pre-trial and trial dates currently set shall be
7 continued for some two months to the following dates, or such other dates in reasonable
8 proximity thereto convenient to the Court’s schedule, as follows:

9 Non Expert Discovery cutoff: June 15, 2015.

10 Expert Disclosure: June 12, 2015.

11 Supplemental Expert Disclosure: June 26, 2015.

12 Expert Discovery cutoff: July 22, 2015.

13 Settlement Conference: July 16, 2015, at 10:00 a.m., Courtroom 9.

14 Non Dispositive Motions:

15 Filing: July 22, 2015.

16 Hearing: August 24, 2015.

17 Dispositive Motions:

18 Filing: July 22, 2015

19 Hearing: September 14, 2015.

20 Pre-Trial Conference: October 19, 2015, at 8:30 a.m., Courtroom 2.

21 Trial: December 1, 2015, at 8:30 a.m., Courtroom 2.

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2. The Case Scheduling Order, dated November 26, 2013, and the Order Re Discovery Cut-
Off and Amending Scheduling Order, signed October 2, 2015, shall be amended to reflect the new
dates.

Dated: March 6, 2015

THE REICH LAW FIRM

By: _____
Jeff Reich
Attorneys for Plaintiffs

Dated: March 6, 2015

CHARLSTON , REVI CH & WOLLITZ LLP

By: _____
Bruce T. Smyth
Attorneys for Defendant

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1 **ORDER**

2 Based on the parties' stipulation, the Court modifies the parties scheduling order as follows:

3 **Non Expert Discovery cutoff: June 15, 2015**

4 **Expert Disclosure: June 12, 2015**

5 **Supplemental Expert Disclosure: June 26, 2015**

6 **Expert Discovery cutoff: July 22, 2015**

7 **Settlement Conference: July 16, 2015, at 10:00 a.m., Courtroom 9**

8 **Non Dispositive Motions:**

9 **Filing: July 22, 2015**

10 **Hearing: August 19, 2015¹**

11 **Dispositive Motions:**

12 **Filing: July 22, 2015**

13 **Hearing: September 14, 2015**

14 **Pre-Trial Conference: October 19, 2015, at 8:30 a.m., Courtroom 2**

15 **Trial: December 1, 2015, at 8:30 a.m., Courtroom 2**

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17 IT IS SO ORDERED.

18 Dated: **March 9, 2015**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

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¹ Although the parties requested August 24, 2015, as the deadline for the hearing of non-dispositive
28 motions, the undersigned hears law and motion on Wednesdays; thus, the deadline has been
adjusted accordingly.