

1 Bruce T. Smyth- State Bar No. 89171
2 **CHARLSTON, REVICH & WOLLITZ LLP**
3 1925 Century Park East, Suite 1250
Los Angeles, California 90067-2746
Tel: (310) 551-7055 • Fax: (310) 203-9321

4 Attorneys for Defendant,
Philadelphia Indemnity Insurance Company
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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

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

13 Plaintiffs,

14 v.

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

17 Defendants.

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

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20 **STIPULATION AND
[PROPOSED] ORDER RE
DISCOVERY CUT-OFF AND
AMENDMENT OF SCHEDULING
ORDER**

21 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
22 original Scheduling Order and Order Amending Scheduling Order be continued in
order to allow additional time for completing depositions and other discovery,
23 while accommodating the respective schedules of counsel;

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

5 WHEREAS, after meeting and conferring, the counsel have agreed to
6 approximate three month extensions of the scheduling dates;

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

9 1. The various deadlines for discovery and pre-trial and trial dates
10 currently set shall be continued for some three months to the following dates, or
11 such other dates in reasonable proximity thereto convenient to the Court's schedule,
12 as follows:

13 Non Expert Discovery cutoff: September 15, 2015.

14 Expert Disclosure: September 11, 2015.

15 Supplemental Expert Disclosure: September 25, 2015.

16 Expert Discovery cutoff: October 30, 2015.

17 Settlement Conference: June 30, 2015, at 10:00 a.m., Courtroom 8.

18 Non Dispositive Motions:

19 Filing: October 27, 2015.

20 Hearing: November 30, 2015.

21 Dispositive Motions:

22 Filing: October 27, 2015

23 Hearing: December 15, 2015.

24 Pre-Trial Conference: January 25, 2016, at 8:30 a.m., Courtroom 2.

25 Trial: March 21, 2016, at 8:30 a.m., Courtroom 2.

26 2. The Case Scheduling Order, dated November 26, 2013, the Order Re
27 Discovery Cut-Off and Amending Scheduling Order, signed October 2, 2015, and

1 the Order re Discovery Cut-Off and Amendment of Scheduling Order, signed
2 March 9, 2015, shall be amended to reflect the new dates.

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4 Dated: April 27, 2015 THE REICH LAW FIRM

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6 By: /s/ Jeff Reich
7 Jeff Reich
Attorneys for Plaintiffs

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10 Dated: April 27, 2015 CHARLSTON, REVICH & WOLLITZ LLP

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12 By: /s/ Bruce T. Smyth
13 Bruce T. Smyth
Attorneys for Defendant

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ORDER

2 Based on the parties' foregoing stipulation and the supplemental statement
3 filed on May 5, 2015, the Court modifies the Scheduling Order dated November 26,
4 2013.

5 Accordingly, discovery deadlines and motion filing deadlines are continued
6 as follows:¹

Non Expert Discovery cutoff: September 15, 2015

Expert Disclosure: September 11, 2015

Supplemental Expert Disclosure: September 25, 2015

Expert Discovery cutoff: October 30, 2015

Settlement Conference: June 30, 2015, at 10:00 a.m., Courtroom 8

Non Dispositive Motions:

Filing: October 27, 2015

Hearing: November 25, 2015

Dispositive Motions:

Filing: October 27, 2015

Hearing: December 14, 2015

Pre-Trial Conference: January 27, 2016, at 8:30 a.m., Courtroom 2

Trial: March 22, 2016, at 8:30 a.m., Courtroom 2

IT IS SO ORDERED.

Dated: May 7, 2015

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

¹ Some of the proposed dates were modified slightly to conform with the Court's calendars.