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Attorneys for Defendant
16 STATE FARM GENERAL INSURANCE COMPANY

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19 UNITED STATES DISTRICT COURT
20 EASTERN DISTRICT OF CALIFORNIA (FRESNO DIVISION)

21 HAROLD and DOROTHY BENNETT,
22 Plaintiffs,
23 vs.
24
25 STATE FARM GENERAL INSURANCE
26 COMPANY, and DOES 1 through 100,
inclusive,
27 Defendant.
28

CASE NO. 1:14-CV-01377 GEB
**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE VDRP SESSION
DEADLINE**

1 Plaintiffs and State Farm General Insurance Company (“State Farm”), by and through their
2 respective counsel, hereby jointly request an order to continue the Voluntary Dispute Resolution
3 Program (“VDRP”) session deadline as follows:

4 **I.**
5 **RECITALS**

6 1. Cynthia Larson, Esq. of the law firm of Orrick, Herrington & Sutcliffe, LLP is
7 appointed to conduct the VDRP session in this matter. The deadline to complete the VDRP session
8 is November 19, 2015. The VDRP session is presently scheduled for November 18, 2015 in
9 Sacramento, California.

10 2. On November 4, 2015, State Farm learned that a conflict developed with the
11 November 18, 2015 session. Counsel for State Farm promptly notified plaintiffs’ counsel as well as
12 the office of Ms. Larsen, and offered four new proposed dates for the VDRP session. Ms. Larsen’s
13 office responded that day stating that Ms. Larsen has a conflict with two of the proposed dates. On
14 that same day, plaintiffs’ counsel informed the office of Ms. Larsen and State Farm’s attorneys that
15 they have conflicts with the other dates proposed by State Farm. Plaintiffs’ counsel further informed
16 State Farm’s counsel and Ms. Larsen’s office that the session will be more meaningful once the
17 depositions of two key witnesses are completed. Those depositions are presently scheduled for
18 December 9, 2016. State Farm’s counsel does not disagree that the December 9, 2015 depositions
19 will help the parties better understand the case for purposes of conducting a meaningful VDRP
20 session.

21 3. The parties met and conferred with one another as well as the office of Ms. Larsen
22 regarding alternative dates to complete the VDRP session. Due to the scheduling conflicts between
23 the parties and Ms. Larsen, it was impossible to schedule an alternative date to conduct the VDRP
24 session prior to the deadline of November 19, 2015. Due to other scheduling conflicts, as well as the
25 holidays in November and December, the parties agreed that rescheduling the session for January
26 2016 would be prudent.

27 4. The parties are informed that Ms. Larsen is available on January 19, 2016 and January
28 21, 2016. The parties have agreed to complete the VDRP session on either January 19, 2016 or

1 January 21, 2016. The parties do not anticipate any further requests for continuances for the VDRP
2 session.

3 **II.**
4 **REQUEST FOR ORDER TO CONTINUE VDRP COMPLETION DEADLINE**

5 Based on the foregoing recitals, the parties hereby request an order to continue the date to
6 complete the VDRP session until January 29, 2016.

7
8 Dated: November 10, 2015 LAW OFFICES OF CRAIG A. MILLER
9
10 By _____ /s/ Patrick A. Calhoon
11 CRAIG A. MILLER
12 PATRICK A. CALHOON
13 Attorneys for Plaintiffs
14 HAROLD and DOROTHY BENNETT

15 Dated: November 10, 2015 HAYES SCOTT BONINO ELLINGSON & McLAY, LLP
16
17 By _____ /s/ Stephen P. Ellingson
18 STEPHEN M. HAYES
19 STEPHEN P. ELLINGSON
20 LAUREN M. CASE
21 Attorneys for Defendant
22 STATE FARM GENERAL INSURANCE
23 COMPANY

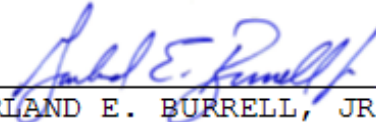
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[PROPOSED] ORDER

Pursuant to the parties' stipulation, the deadline to complete VDRP session is January 29, 2016.

Dated: November 10, 2015



GARLAND E. BURRELL, JR.
Senior United States District Judge