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15 Attorneys for Plaintiffs  
 16 HAROLD and DOROTHY BENNETT and  
 DOROTHY PICKERING as Conservator of the Person  
 17 and Estate of Harold Bennett

18  
 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.  
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CASE NO. 1:14-CV-01377 GEB  
**STIPULATION AND  
 ORDER TO REVISE THE COURT'S  
 SCHEDULING ORDER**

1 Plaintiffs and State Farm General Insurance Company (“State Farm”), by and through their  
2 respective counsel, hereby stipulate to revise the Court’s May 29, 2015 Pretrial Scheduling Order  
3 (Dkt. 19) as follows:

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

6 1. The parties have been working diligently toward moving this case forward in an  
7 efficient, expeditious manner. The following deadlines are currently in place:

- 8 • The deadline to complete initial expert witness disclosures is December 16, 2015;
- 9 • The deadline for rebuttal expert disclosures is January 13, 2016;
- 10 • The deadline for all discovery to be completed is April 20, 2016;
- 11 • The deadline for hearing of dispositive motions is June 20, 2016;
- 12 • The final pre-trial conference is August 15, 2016;
- 13 • The trial date is November 1, 2016.

14 2. Despite the parties’ diligent efforts and cooperation to complete fact discovery,  
15 including the depositions of fact witnesses, the parties will not be ready to make initial expert  
16 witness disclosures by the current deadline, December 16, 2015. For these reasons, the parties have  
17 agreed to stipulate to a proposed order continuing the deadline for expert disclosure, rebuttal  
18 disclosure, and the discovery deadline, to enable the parties to complete fact and expert discovery  
19 without incurring undue burden and expense.

20 3. The parties do not seek to continue any deadlines other than the deadlines for expert  
21 disclosure, rebuttal disclosure, and discovery completion. The parties do not seek to continue the  
22 trial date or the pretrial conference date.

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**II.  
STIPULATION**

The parties hereby stipulate to the following revisions to the court’s Pretrial Schedule:

- 1. Expert Disclosure March 25, 2016  
(currently December 16, 2015)
- 2. Expert Rebuttal April 12, 2016  
(currently January 13, 2016)
- 3. Deadline to complete all discovery May 20, 2016  
(currently April 20, 2016)

Dated: November 9, 2015

LAW OFFICES OF CRAIG A. MILLER

By /s/ Craig A. Miller (as authorized on 11/09/2015)  
CRAIG A. MILLER  
PATRICK A. CALHOON  
Attorneys for Plaintiffs  
HAROLD and DOROTHY BENNETT

Dated: November 9, 2015

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

By /s/ Stephen P. Ellingson  
STEPHEN M. HAYES  
STEPHEN P. ELLINGSON  
LAUREN M. CASE  
Attorneys for Defendant  
STATE FARM GENERAL INSURANCE  
COMPANY

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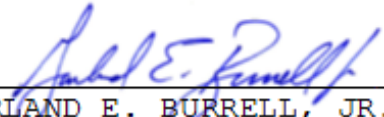
**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, the Pretrial Schedule is revised as follows:

- |                                       |  |
|---------------------------------------|--|
| 1. Expert Disclosure                  | <u>March 25, 2016</u><br>(currently December 16, 2015) |
| 2. Expert Rebuttal                    | <u>April 12, 2016</u><br>(currently January 13, 2016)  |
| 3. Deadline to complete all discovery | <u>May 20, 2016</u><br>(currently April 20, 2016)      |

The remaining dates and deadlines set forth in the Court's May 29, 2015 Pretrial Scheduling Order (Dkt 19) remain unchanged.

Dated: November 19, 2015

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