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

17 UNITED STATES DISTRICT COURT
 18 EASTERN DISTRICT OF CALIFORNIA (FRESNO DIVISION)

19
 20 HAROLD and DOROTHY BENNETT,
 21 Plaintiffs,
 22 vs.
 23 STATE FARM GENERAL INSURANCE
 24 COMPANY, and DOES 1 through 100,
 inclusive,
 25 Defendant.

CASE NO. 1:14-CV-01377 JAM-JLT
**STIPULATION AND ORDER TO
 REVISE THE COURT’S SCHEDULING
 ORDER**

26
 27 Plaintiffs and State Farm General Insurance Company (“State Farm”), by and through their
 28 respective counsel, hereby stipulate to revise the Court’s January 11, 2016 Amended Status (Pretrial

1 Scheduling) Order (Dkt. 37) as follows:

2 **I.**
3 **RECITALS**

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

- 6 • The deadline to complete initial expert witness disclosures is March 25, 2016;
- 7 • The deadline for rebuttal expert disclosures is April 12, 2016;
- 8 • The deadline for all discovery to be completed is May 20, 2016;
- 9 • The deadline for hearing of dispositive motions is July 12, 2016;
- 10 • The final pre-trial conference is August 26, 2016;
- 11 • The trial date is October 17, 2016.

12 2. Despite the parties' diligent efforts, the parties anticipate that it will be difficult to
13 engage in expert disclosures by the current deadline of March 25, 2016. The parties also recognize
14 that the expert deadlines can be continued without impacting the other dates and deadlines in the
15 current Status (Pre-Trial Scheduling) Order. For these reasons, the parties have agreed to stipulate
16 to a proposed order continuing the deadline for expert disclosure, rebuttal disclosure, and the
17 discovery deadline.

18 3. The parties also wish to have a brief discovery window after the hearing on a
19 dispositive motion to schedule depositions that will be unnecessary for the motion, which might be
20 avoided if the motion is granted.

21 4. The parties are mindful of the pretrial dates and deadlines in the current Status (Pre-
22 Trial Scheduling) Order, including the Pretrial Conference and deadline to submit the Joint Pretrial
23 Statement. The parties do not anticipate any issues meeting those deadlines under the new dates for
24 expert disclosures and deadline for all discovery.

25 5. The parties do not seek to continue any deadlines other than the deadlines for expert
26 disclosure, rebuttal disclosure, and completion of all discovery. The parties do not seek to continue
27 the 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 May 27, 2016
(currently March 25, 2016)

2. Expert Rebuttal June 17, 2016
(currently April 12, 2016)

3. Deadline to complete all discovery July 19, 2016
(currently May 20, 2016)

Dated: February 8, 2016

LAW OFFICES OF CRAIG A. MILLER

By /S/ Patrick A. Calhoon
CRAIG A. MILLER
PATRICK A. CALHOON
Attorneys for Plaintiffs
HAROLD and DOROTHY BENNETT

Dated: February 8, 2016

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

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

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ORDER

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

- 1. Expert Disclosure May 27, 2016
(currently March 25, 2016)

- 2. Expert Rebuttal June 17, 2016
(currently April 12, 2016)

- 3. Deadline to complete all discovery July 19, 2016
(currently May 20, 2016)

The remaining dates and deadlines set forth in the Court's January 11, 2016 Pretrial Scheduling Order (Dkt 37) remain unchanged.

Dated: 2/8/2016

/s/ John A. Mendez
HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE