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11 Attorneys for Defendants AMERICAN
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 12 COMPANY, AEROSPACE INSURANCE
 MANAGERS, INC., AND AEROSPACE
 13 INSURANCE SERVICES

14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

17 GARY R. FARRAR, as Chapter 7 Trustee of
 the bankruptcy estate in In re: Cavanagh,
 18 United States Bankruptcy Court, Eastern
 District of California, Case No. 13-92200,

19 Plaintiff,

20 vs.

21 AMERICAN NATIONAL PROPERTY AND
 22 CASUALTY COMPANY, AEROSPACE
 INSURANCE MANAGERS, INC.,
 23 AEROSPACE INSURANCE SERVICES,

24 Defendants.
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CASE NO. 15-CV-01177-TLN-SKO

**JOINT STIPULATION TO AMEND
 PRETRIAL SCHEDULING ORDER TO
 EXTEND DISCOVERY CUT-OFF FOR
 DEPOSITIONS OF WILLIAM AND
 PATRICIA CAVANAUGH**

Honorable Troy L. Nunley

Complaint Filed: July 29, 2015
 Trial Date: January 22, 2018

1 AMERICAN NATIONAL PROPERTY AND
2 CASUALTY COMPANY,

3 Third-Party Plaintiff,

4 vs.

5 WILLIAM G. CAVANAUGH, an individual;
6 GARY R. FARRAR, as Chapter 7 Trustee of
7 the bankruptcy estate in In re: Cavanagh,
8 United States Bankruptcy Court, Eastern
9 District of California, Case No. 13-92200; and
10 BILL COULTER dba CASTLE AVIATION
11 AND REPAIR, and ROES 1 to 20, Inclusive,

12 Third-Party Defendants.

13 Plaintiff and Third-Party Defendant Trustee Gary R. Farrar (“Trustee”), Third-Party
14 Defendant William G. Cavanaugh (“Cavanaugh”), Defendant and Third-Party Plaintiff American
15 National Property and Casualty Company (“American National”), and Defendants Aerospace
16 Insurance Managers, Inc. and Aerospace Insurance Services, through their respective counsel,
17 stipulate as follows:

18 1. Cavanaugh filed the present action on or about July 29, 2015, alleging three cause
19 of action: (a) to collect on a judgment entered in underlying litigation against American National
20 insured Bill Coulter (“Coulter”); (b) breach of contract as an assignee of Coulter’s rights under the
21 American National Airport Liability Insurance Policy at issue in this action based on defendants’
22 alleged failure to defend, settle and indemnify Coulter in connection with the underlying action;
23 and (c) breach of the implied covenant of good faith and fair dealing (bad faith) based upon
24 defendants’ conduct after Cavanaugh became a third-party beneficiary of the insurance contract.

25 2. On February 1, 2016, this Court entered a Pretrial Scheduling Order. As of that
26 date, the order cut off the joinder of parties and amendment of pleadings without leave of court.
27 The Pretrial Scheduling Order also set the discovery cut-off on February 2, 2017 and trial on
28 January 22, 2018.

1 3. On December 21, 2016, the parties stipulated to amend the Pretrial Scheduling
2 Order to (a) allow the filing of American National’s proposed Third-Party Complaint for
3 Reformation of Insurance Policy, and (b) extend the Non Expert Discovery Cut-off to March 31,
4 2017, Expert Disclosure to May 19, 2017, and the disclosure of Supplemental experts to within 20
5 days after this date. On December 27, 2016, the Court “so ordered” the parties’ stipulation.

6 4. On April 27, 2017, the Court entered an order (a) substituting Gary R. Farrar, as
7 Chapter 7 Trustee of the bankruptcy estate in In re: Cavanagh, United States Bankruptcy Court,
8 Eastern District of California, Case No. 13-92200 (“Trustee”), as Plaintiff in this action in place of
9 Cavanaugh; and (b) permitting American National to amend its Third-Party Complaint for
10 Reformation.

11 5. On April 28, 2017, American National filed its First Amended Third-Party
12 Complaint for Reformation, naming as third-party defendants Cavanaugh, the Trustee, and Bill
13 Coulter dba Castle Aviation and Repair. Mr. Coulter has not appeared in this action.

14 6. To accommodate Mr. Cavanaugh, whose ability to travel is made difficult by health
15 issues, and to allow for the efficient resolution of this action without the need to incur unnecessary
16 expenses, the parties stipulate, subject to approval of the Court, that the Non Expert Cut-Off as
17 applicable solely to the depositions of William Cavanaugh and his wife, Patricia Cavanaugh, is
18 extended until either (1) thirty days after the Court rules on any dispositive motions filed in this
19 matter, or (2) if no such motions are filed, thirty days after August 24, 2017, the last day set forth
20 in the Pretrial Scheduling Order for hearing dispositive motions. All other dates set forth in the
21 Pretrial Scheduling Order remain unchanged.

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DATED: May 2, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Stephen V. Kovarik
Rebecca R. Weinreich
Stephen V. Kovarik
Attorneys for American National Property and
Casualty Company, Aerospace Insurance
Managers, Inc., Aerospace Insurance Services

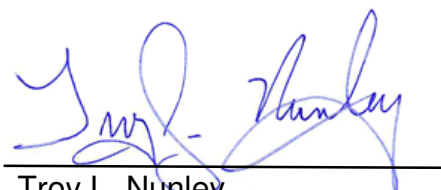
DATED: May 2, 2017

MANNION & LOWE

By: /s/ E. Gerard Mannion
(as authorized on May 2, 2017)
E. Gerard Mannion
Demian I. Oksenendler
Attorneys for Plaintiff and Third-Party Defendant
Trustee Gary Farrar, and Third-Party Defendant
William G. Cavanaugh

IT IS SO ORDERED.

Dated: May 4, 2017



Troy L. Nunley
United States District Judge