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12 COMMERCIAL INSURANCE COMPANY

13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF CALIFORNIA**

15 RAYMOND MURO, an individual, and
16 LUPE MURO, an individual,

17 Plaintiffs,

18 vs.

19 TRAVELERS COMMERCIAL
20 INSURANCE COMPANY, and DOES 1
21 through 10,

22 Defendants.

CASE NO. 1:17-CV-00170-LJO-MJS

**STIPULATION TO EXTEND
CERTAIN PRE-TRIAL DEADLINES**

Complaint Filed: February 7, 2017

23 Plaintiffs RAYMOND MURO, an individual, and LUPE MURO, an individual (collectively
24 “Plaintiffs”) and Defendant TRAVELERS COMMERCIAL INSURANCE COMPANY
25 (“Travelers”), by and through their respective counsel, hereby submit this Stipulation and Proposed
26 Order for a continuance of certain pre-trial deadlines

27 WHEREAS, the Scheduling Order dated May 11, 2017 set a trial date of September 11,
28 2018 and attendant pre-trial deadlines;

WHEREAS, the parties desire to participate in a meaningful mediation prior to completing
percipient discovery and incurring costs associated with expert discovery;

WHEREAS, because of scheduling conflicts, the parties cannot complete mediation until
January 2018;

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WHEREAS, the parties wish to continue pre-trial deadlines to permit them to mediate this matter before completing percipient discovery and before the parties incur costs associated with expert discovery;

WHEREAS, this is the first continuance that the parties have requested;

WHEREAS, the parties' counsel have conferred and stipulated to a continuance of the dates set forth in the Scheduling Order as follows:

Discovery Deadlines:

Non-Expert: 3/9/2018

Expert: 4/23/2018

Expert Disclosure Deadlines:

Filing: 3/30/2018

Supplemental/Rebuttal: 4/13/2018

Motion Deadlines:

Non-Dispositive:

Filing: 5/7/2018

Hearing: To Be Determined

Dispositive:

Filing: 5/11/2018

Hearing: 6/26/2018 at 8:30 AM

NOW THEREFORE, it is stipulated that the parties agree to continue certain pre-trial deadlines as set forth above

DATED: November 21, 2017

**FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC**

By: /s/ Marjie D. Barrows
Marjie D. Barrows
Kathleen M. DeLaney

Attorneys for Defendant TRAVELERS
COMMERCIAL INSURANCE COMPANY

DATED: November 21, 2017

KERLEY SCHAFFER LLP

By: /s/ J. Edward Kerley
J. Edward Kerley
Dylan L. Schaffer

Attorneys for Plaintiffs RAYMOND and
LUPE MURO

ORDER

The Court has considered the above Stipulation to Continue Certain Pre-trial Deadlines. Given this Court's **policy of not changing dispositive motion deadlines or pretrial conference and trial dates**, but good cause appearing for modifying earlier pretrial dates and deadlines,

IT IS HEREBY ORDERED THAT:

The Scheduling Order is modified so that the deadlines in this matter are as follows:

Discovery Deadlines:

Non-Expert: 3/9/2018

Expert: 4/23/2018

Expert Disclosure Deadlines:

Filing: 3/30/2018

Supplemental/Rebuttal: 4/13/2018

Non-Dispositive Motion Deadline:

Filing: 5/7/2018

Hearing: To Be Determined

The Deadline for filing and hearing dispositive motions shall remain April 13, 2018 and May 29, 2018, respectively, the Pretrial Conference will remain as scheduled on July 17, 2018, and trial shall begin on September 11, 2018, as previously scheduled.

IT IS SO ORDERED.

Dated: November 21, 2017

/s/ Michael J. Seng
UNITED STATES MAGISTRATE JUDGE