

1 MATTHEW S. FOY (SBN: 187238)
mfoy@grsm.com
2 JENNIFER N. WAHLGREN (SBN: 249556)
jwalgren@grsm.com
3 GORDON REES SCULLY MANSUKHANI, LLP
275 Battery Street, Suite 2000
4 San Francisco, CA 94111
Telephone: (415) 875-3174
5 Facsimile: (415) 986-8054

6 Attorneys for Defendant
AMCO INSURANCE COMPANY

7
8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 JENNIFER MARIE TUCKER,) CASE NO. 1:17-cv-01761-DAD-SKO
12 Plaintiff,)
13 vs.) **STIPULATION TO CONTINUE**
14 AMCO INSURANCE COMPANY, and Does 1) **DISCOVERY AND EXPERT**
through 25, inclusive,) **DISCLOSURE DEADLINES; ORDER**
15 Defendants) **(Doc. 15)**
16) State Court Complaint Filed:
November 17, 2017
17) Removal Filed: January 28, 2017

18 Plaintiff Jennifer Marie Tucker (“Plaintiff”) and Defendant AMCO Insurance Company
19 (“AMCO”) (collectively, the “Parties”) stipulate as follows:

20 WHEREAS, the Scheduling Order filed in this case (ECF No. 11) sets forth the following
21 deadlines:

22 Discovery Deadlines:

23 Non-Expert: 12/4/18

24 Expert: 1/18/19

25 Expert Disclosure Deadlines:

26 Filing: 12/18/18

27 Supplemental/Rebuttal: 1/2/19
28

1 WHEREAS, the Parties agree that the foregoing discovery and expert disclosure deadlines
2 should be continued by two months to allow additional time for the Parties to complete discovery
3 while also permitting more time for the Parties to discuss possible resolution of the claims at issue
4 in this litigation.

5 WHEREAS, the Parties are not requesting any continuance of any of the other deadlines
6 or trial date in connection with this litigation.

7 THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

8 The Scheduling Order should be amended to set forth the following new deadlines for
9 discovery and expert disclosures, which extend those deadlines by two months:

10 Discovery Deadlines:

11 Non-Expert: 2/4/19

12 Expert: 3/18/19

13 Expert Disclosure Deadlines:

14 Filing: 2/20/19

15 Supplemental/Rebuttal: 3/4/19

16 SO STIPULATED.

17
18 Dated: October 23, 2018

WILKINS, DROLSHAGEN & CZESHINSKI LLP

19
20 By /s/ James H. Wilkins (as authorized on 10/23/18)
21 James H. Wilkins
22 Attorneys for Plaintiff
JENNIFER MARIE TUCKER

23 Dated: October 23, 2018

GORDON REES SCULLY MANSUKHANI, LLP

24
25 By /s/ Jennifer N. Wahlgren
26 Matthew S. Foy
27 Jennifer N. Wahlgren
28 Attorneys for Defendant
AMCO INSURANCE COMPANY

ORDER

Based in part on the parties' above-stipulation (Doc. 15), and with good cause shown, the Court hereby ORDERS that the Scheduling Order (Doc. 11) is modified as follows:¹

Event	Prior Date	Continued Date
Non-Expert Discovery Completion	December 4, 2018	February 4, 2019
Expert Disclosures	December 18, 2018	February 20, 2019
Rebuttal Expert Disclosures	January 2, 2019	March 4, 2019
Expert Discovery Completion	January 18, 2019	March 18, 2019
Non-Dispositive Motion Filing	January 18, 2019	March 20, 2019
Non-Dispositive Motion Hearing	None set	April 17, 2019
Dispositive Motion Filing	February 1, 2019	April 2, 2019
Dispositive Motion Hearing	March 19, 2019	May 21, 2019
Settlement Conference	None set	June 13, 2019, 1:00 pm in Courtroom 10 before United States Magistrate Judge Erica P. Grosjean ²
Pretrial Conference	June 4, 2019, 1:30 pm	July 29, 2019, at 1:30 pm
Trial	August 20, 2019, 1:00 p.m.	September 24, 2019, at 8:30 a.m.

IT IS SO ORDERED.

Dated: October 26, 2018

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

¹ Several of the dates proposed by the parties have been adjusted to comport with the Court's calendar, to allow the Court adequate time to rule on dispositive motions, and to permit the parties sufficient time to prepare their pretrial submissions and for trial.

² Settlement conferences are required in all cases in which District Judge Drozd is the presiding judge.