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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

ASHLEE VARELA, an individual,

Plaintiff,

v.

STATE FARM GENERAL INSURANCE
COMPANY, an Illinois Corporation, and
DOES 1 through 10,

Defendant.

Case No. 1:19-CV-00617-DAD-EPG

**FURTHER STIPULATION AND ORDER
REGARDING DISCOVERY CUT-OFFS**

(ECF No. 31)

Plaintiff Ashlee Varela and Defendant State Farm General Insurance Company, by and through their attorneys of record, hereby agree and stipulate as follows:

RECITALS

The initial scheduling order in this case was entered on September 26, 2019. On June 2, 2020, the Court entered its Order Granting Stipulation for Extension of Non-Expert and Expert Discovery Deadlines. The June 2nd order extended the deadlines for Non-Expert Discovery (extended to October 13, 2020) and Expert Discovery (extended to November 13, 2020). All other dates established by the original order remain unchanged, including the deadlines for expert disclosures and rebuttal expert disclosures, the dispositive motion deadline, the pre-trial conference date and the trial date. On July 21, 2020, the Court entered its Order Granting Stipulation to address

1 the parties' request that the deadline for expert disclosures follow the new discovery deadlines that
2 were the subject of the June extension. Accordingly, the deadline for initial exchange of expert
3 disclosures was extended to October 16, 2020. The deadline for rebuttal expert disclosures was
4 extended to October 30, 2020.

5 **STIPULATION**

6 Since the July 21, 2020 Order, the parties have engaged in additional discovery in an attempt
7 to comply with the current deadline, including enlisting the assistance of the Court by way of
8 informal discovery conference. However, despite the diligence of the parties, certain discovery may
9 not be completed by the current deadline. For example, the parties are attempting to schedule four
10 key witness depositions the weeks of October 5th and 16th. Several attempts were made to clear
11 dates for witnesses on both sides, but we unable to be accommodated prior to this time.

12 In an effort to allow for scheduling of this ongoing discovery, the Parties, through their
13 attorneys of record, stipulate and agree that all discovery-related deadlines be extended by 90 days.
14 The parties are not requesting to continue the pre-trial conference or trial date at this time.

Event/Deadline	Date
Non-Expert Discovery Cut-Off	January 13, 2021
Expert Disclosure	January 18, 2021
Rebuttal Expert Disclosure	February 1, 2021
Expert Discovery Cut-off	February 15, 2021
Dispositive Motion Cut-off	February 19, 2021
Pre-trial Conference	March 29, 2021 (unchanged)
Trial	June 8, 2021 (unchanged)

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Dated: September 11, 2020

KERLEY SCHAFFER LLP

By: /s/ Christopher Carling
 J. Edward Kerley
 Dylan L. Schafer
 Christopher Carling
 Attorneys for Ashlee Varela

Dated: September 11, 2020

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/Dana B. Denno
 Dana B. Denno
 Attorneys for State Farm General Insurance
 Company

1 **ORDER**

2 On September 11, 2020, the parties filed a stipulation and proposed order for extension of
3 discovery cutoffs. (ECF No. 31). The motion also requested a new date for a dispositive motion
4 cutoff. As such, the Court will grant the parties' motion to the extent it seeks new dates. However,
5 the Court will also continue the pretrial conference and trial to accommodate the newly requested
6 dispositive motion filing date.

7 Accordingly, finding good cause, the scheduling order in this case is HEREBY
8 MODIFIED as follows:

9

Event/Deadline	Date
Non-Expert Discovery Cut-Off	January 13, 2021
Expert Disclosure	January 18, 2021
Rebuttal Expert Disclosure	February 1, 2021
Expert Discovery Cut-off	February 15, 2021
Dispositive Motion Cut-off	February 19, 2021
Pre-trial Conference	July 26, 2021 at 1:30 p.m.
Trial	September 28, 2021 at 8:30 a.m.

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18 IT IS SO ORDERED.

19 Dated: September 14, 2020

20 /s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE

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