

1 Avi N. Wagner (CA Bar No. 226688)
 2 THE WAGNER FIRM
 3 1801 Avenue of the Stars, Suite 307
 4 Los Angeles, California 90067
 5 Telephone: (310) 491-7949
 6 Facsimile: (310) 491-7949
 7 E-mail: avi@thewagnerfirm.com

8 Counsel for Plaintiffs

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 10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA
 12 SACRAMENTO DIVISION

13	MULTIFAMILY CAPTIVE GROUP, LLC, a)	Case No. 2:08-CV-00547 FCD DAD
14	Maryland Corporation; and SAMANTHA)	
15	GUMENICK, an individual,)	STIPULATION AND ORDER EXTENDING
16	Plaintiffs,)	EXPERT DISCOVERY PERIOD
17	v.)	
18	ASSURANCE RISK MANAGERS, INC., a)	
19	Colorado Corporation; LISA ISOM, an)	
20	individual; and CALIFORNIA APARTMENT)	
21	ASSOCIATION, a California Corporation,)	
22	Defendants.)	

23 Plaintiffs Multifamily Captive Group, LLC and Samantha Gumenick (collectively
 24 “Plaintiffs”), and defendants California Apartment Association (“CAA”), Lisa Isom (“Isom”) and
 25 Assurance Risk Managers, Inc. (“ARM”) (collectively “Defendants”) make the following
 26 stipulation in connection with the following facts:

27 WHEREAS, on June 25, 2009 the Court denied Plaintiffs’ motion for the exclusion of
 28 expert testimony by Defendants’ (the “Order”), extending the period for designating primary
 experts to July 3, 2009 and rebuttal experts on July 15, 2009 and ordered expert discovery to be
 completed by August 17, 2009;

1 WHEREAS Plaintiffs had designated an expert prior to the Order and Defendants’
2 designated an expert on July 3, 2009;

3 WHEREAS, Plaintiffs’ counsel had previously planned to be away at his nuptial and
4 honeymoon during the majority of August 2009 (when, prior to the Order, no deadlines were
5 scheduled);

6
7 WHERAS at the request of Plaintiff’ counsel (as result of the aforementioned nuptials and
8 honeymoon), the parties have conferred and agreed to extend the deadline for expert discovery;

9 NOW THERERFORE, the parties agree that under the circumstances the period for expert
10 discovery (including depositions) should be extended to and including October 9, 2009.

11 Respectfully submitted,

12 Dated: July __, 2009

THE WAGNER FIRM

13 By: / s/ Avi N. Wagner
14 Avi N. Wagner

15 Counsel for Plaintiffs

16 Dated: July __, 2009

PAHL & MCKAY LLP

17 By: / s/ Servando Sandoval (with permission to
18 Avi Wagner)
19 Servando Sandoval

20 Counsel for CAA

21 Dated: July __, 2009

MILLER & LAW P.C.

22 By: / s/ Curtis Henry (with permission to
23 Avi Wagner)
24 Curits Henry

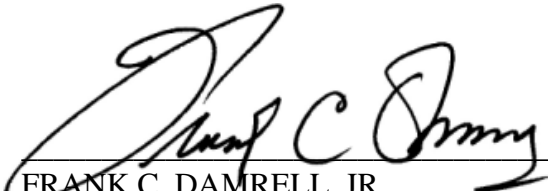
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ORDER

Good cause appearing therefor, expert discovery (including depositions) should be extended to and including October 9, 2009.

Dated: July 10, 2009



FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

The undersigned certifies that the above instrument was filed electronically with the Clerk of the Court via the CM/ECF system which effects notification to all parties registered and designated for the CM/ECF system in this action.

Dated: July __, 2009

/s/ Avi N. Wagner

Avi N. Wagner