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11 Attorneys for Defendant,  
 GEORGE C. VISMAN, individually and as Trustee of  
 12 the GEORGE C. VISMAN REVOCABLE TRUST dba  
 HIGH HILL RANCH

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 14  
 15 **UNITED STATES DISTRICT COURT**  
 16 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

18 THOM TAYLOR,  
 19 Plaintiff,

20 v.

21 GEORGE C. VISMAN, individually and  
 as Trustee of the GEORGE C. VISMAN  
 22 REVOCABLE TRUST dba HIGH HILL  
 RANCH, and DOES 1 through 50,  
 23 inclusive,  
 24 Defendants.

CASE NO.: 2:10-CV-00360-GEB-KJM

**JOINT STIPULATION AND  
 [PROPOSED] ORDER TO  
 CONTINUE INITIAL AND  
 REBUTTAL EXPERT WITNESS  
 DISCLOSURES**

26 Plaintiff, THOM TAYLOR ("Plaintiff") and Defendant, GEORGE C. VISMAN,  
 27 individually and as Trustee of the GEORGE C. VISMAN REVOCABLE TRUST dba  
 28 HIGH HILL RANCH ("Defendant"), by and through their respective counsel, hereby

1 jointly stipulate and request that the Court grant a 60-day continuance of the initial  
2 expert witness disclosure deadline (July 16, 2010) and the rebuttal expert witness  
3 disclosure deadline (August 16, 2010) as set out in this Court's Status (Pretrial  
4 Scheduling) Order filed on June 8, 2010 based on the following good cause:

5 1. Plaintiff filed his action on February 11, 2010 seeking renovations to  
6 HIGH HILL RANCH in Placerville, California to improve disabled access, as well as  
7 seeking damages and attorney's fees, litigation expenses, and costs.

8 2. Defendant filed its answer to the Complaint on June 4, 2010. Since that  
9 time, the parties have begun settlement discussions, but additional information is  
10 required. Both parties believe that the opportunities for settlement are enhanced by  
11 saving the expense of expert witness costs at this time.

12 3. The parties wish to continue the initial and rebuttal expert witness  
13 disclosure deadlines to allow the parties an opportunity to work towards resolution of  
14 this matter.

15 4. While the parties are working in good faith to resolve this matter, the  
16 initial and rebuttal exchange disclosure dates currently loom at July 16, 2010 and  
17 August 16, 2010. Forcing the parties to have their experts finalize their opinions and  
18 issue reports at this time would significantly increase the cost of the case without  
19 increasing the likelihood of settlement.

20 5. The parties therefore jointly request that the Court grant a continuance of  
21 the initial expert witness disclosure deadline from July 16, 2010 to September 16, 2010  
22 and the rebuttal expert witness disclosure deadline from August 16, 2010 to October 15,  
23 2010 to allow the parties an opportunity to negotiate resolution of Plaintiff's claims  
24 before engaging in discovery and motion practice.

25 6. A continuance will not affect any of the other deadlines in this case, as the  
26 discovery cut-off is not until December 15, 2010, and the last day to hear motions is  
27 February 7, 2011. Trial of this matter is not until July 26, 2011.

28 **IT IS HEREBY STIPULATED** as follows:

- 1           1.     That the initial expert witness disclosure deadline be moved from July 16,  
2 2010 to September 16, 2010;  
3           2.     That the rebuttal expert witness disclosure deadline be moved from  
4 August 16, 2010 to October 15, 2010; and  
5           3.     That all other previously scheduled dates in this matter are to remain  
6 unchanged.

7           **SO STIPULATED:**

8 DATED: July 12, 2010

SINGLETON LAW GROUP

9  
10 By: /s/ Jason K. Singleton

JASON K. SINGLETON  
Attorney for Plaintiff,  
THOM TAYLOR

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12  
13 DATED: July 12, 2010

GREENBERG TRAURIG, LLP

14  
15 By: /s/ Kathleen E. Finnerty

KATHLEEN E. FINNERTY  
Attorney for Defendant  
GEORGE C. VISMAN, individually  
and as Trustee of the GEORGE C.  
VISMAN REVOCABLE TRUST dba  
HIGH HILL RANCH

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**ORDER**

**IT IS HEREBY ORDERED** that:

1. The initial expert witness disclosure is continued to September 16, 2010;
  2. The rebuttal expert witness disclosure is continued to October 15, 2010;
- and
3. All remaining pretrial and trial dates in this matter are unchanged.

DATED: July 15, 2010

  
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GARLAND E. BURRELL, JR.  
United States District Judge