

1 GLYNN & FINLEY, LLP
 ADAM FRIEDENBERG, Bar No. 205778
 2 JONATHAN A. ELDREDGE, Bar No. 238559
 One Walnut Creek Center
 3 100 Pringle Avenue, Suite 500
 Walnut Creek, CA 94596
 4 Telephone: (925) 210-2800
 Facsimile: (925) 945-1975
 5
 Attorneys for Defendant
 6 General Electric Company

7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 STATE FARM GENERAL INSURANCE) **Case No. CV 10-02764-KJM-DAD**
 COMPANY, as subrogee for Jack Burrows,,) **STIPULATION AND ORDER RE**
 12) **EXPERT DISCOVERY DATES**
 Plaintiff,)
 13)
 vs.)
 14)
 GENERAL ELECTRIC COMPANY;)
 15 SAMSUNG ELECTRONICS AMERICA,)
 INC, and DOES 1 through 25, inclusive,)
 16)
 Defendants.)
 17)
 _____)

18
 19 WHEREAS, on July 28, 2011, the Court issued an order setting the following expert
 20 discovery dates: (1) the expert disclosure date is November 3, 2011; (2) the supplemental expert
 21 disclosure date is November 17, 2011; and (3) the discovery cut-off (fact and expert) is
 22 December 15, 2011. (Docket No. 32.)

23 WHEREAS, pursuant to The Honorable John A. Mendez’s “Status (Pre-trial Scheduling)
 24 Order,” dated December 13, 2010, the final pre-trial conference is January 11, 2012 and trial is
 25 set for February 27, 2012. (Docket No. 16.)

26 WHEREAS, the parties have engaged in written discovery, but have not conducted any
 27 depositions to date;

28 ///

1 WHEREAS, on October 26, 2011, General Electric Company's expert will physically
2 inspect the oven that is alleged to have caused the fire alleged in the complaint;

3 WHEREAS, Plaintiff's Rule 30(b)(6) deposition is tentatively scheduled for November
4 15, 2011, and Plaintiff's insured's deposition is tentatively scheduled for November 11, 2011.

5 THEREFORE, the parties stipulate and request that the Court order that: (1) the expert
6 disclosure date is continued to December 2, 2011; (2) the supplemental expert disclosure date is
7 continued to December 14, 2011; and (3) the discovery cut-off (fact and expert) is continued to
8 December 23, 2011. All other dates remain unchanged.

9

10 IT IS SO STIPULATED.

11 Dated: October 27, 2011

GLYNN & FINLEY, LLP

12

13

By /s/ Adam Friedenber
Attorneys for Defendant
General Electric Company

14

15

16

Dated: October 27, 2011

LAW OFFICES OF GEORDAN GOEBEL

17

18

By /s/ Geordan Goebel
Attorneys for Plaintiff
State Farm General Insurance Company
(as subrogee for Jack Burrows)

19

20

21 IT IS SO ORDERED.

22

23 Dated: November 2, 2011.

24

25

26


UNITED STATES DISTRICT JUDGE

27

28