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6 Attorney for Defendants STEVE WRIGHT; CAROL WRIGHT; ALL PROFESSIONAL
 7 REALTY, INC.; and ALL PROFESSIONAL HAWAII REALTY, INC.

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

11
 12 CENTURY 21 REAL ESTATE, LLC, a
 13 Delaware Limited Liability Company
 14 formerly known as Century 21 Real
 Estate Corporation,

15 Plaintiff,

16 vs.

17 ALL PROFESSIONAL REALTY, INC., a
 18 California corporation doing business as
 CENTURY 21 ALL PROFESSIONAL;
 19 STEVEN M. WRIGHT, an individual;
 20 and CAROL WRIGHT, an individual,

21 Defendants.

**Case No: 2:10-cv-2751 WBS GGH
 Consolidated with Case Nos. 2:10-
 cv-2846 WBS GGH and 2:11-cv-
 02497 WBS GGH**

**REVISED STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 PRE-TRIAL SCHEDULING DATES**

22
 23 **TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

24 Plaintiff Century 21 Real Estate, LLC and Defendants All Professional Realty,
 25 Inc., All Professional Hawaii Realty, Inc., Steve M. Wright and Carol Wright, by and
 26 through their attorneys of record, stipulate and request that the pre-trial scheduling
 27 dates be continued to allow the parties to participate in mediation in good faith before
 28 mediator Lori Gualco on April 12, 2012. The dates were previously continued by order

1 dated February 16, 2012, but the stipulation filed was not the final agreed upon
2 stipulation (due to an error by filing counsel) and failed to account for additional delay
3 based upon the parties' choice of mediator. A subsequent stipulation and order, setting
4 the deadlines out further, was denied without prejudice by Magistrate Judge Gregory G.
5 Hollows. The request for the continuance is due to the parties' attempt to informally
6 resolve this matter short of trial, through private mediation. The parties desire to
7 participate in mediation, but would like to avoid incurring additional discovery costs at
8 this time while pursuing full resolution of the matter. Based upon the denial of the
9 previous stipulation and order without prejudice, the parties have revised the stipulation
10 to avoid any potential interference with the currently scheduled pretrial conference and
11 trial dates. Therefore, the parties stipulate to the following new and revised pre-trial
12 schedule:

13 1) The trial date shall remain set for October 30, 2012 at 9:00 a.m. in
14 Courtroom 5;

15 2) The Final Pretrial Conference shall remain set for August 20, 2012 at 2:00
16 p.m. in Courtroom 5;

17 3) The deadline for filing all motions, except motions for continuances,
18 temporary restraining order, or other emergency applications, shall remain set for June
19 18, 2012;

20 4) The deadline to complete all discovery (including the resolution of any
21 discovery disputes) shall be continued until June 18, 2012;

22 5) The deadline to disclose experts and produce reports pursuant to Federal
23 Rule of Civil Procedure 26(a)(2) shall be continued until no later than May 2, 2012;

24 6) The deadline to disclose rebuttal experts and their reports in accordance
25 with Federal Rule of Civil Procedure 26(a)(2) shall be continued until no later than May
26 31, 2012.

1 Dated: 3/16/2012

By: //s// Virginia Cale

2 Virginia Cale, (SBN: 258557)
3 GOODMAN & ASSOCIATES
4 Attorney for Defendants ALL
5 PROFESSIONAL REALTY, INC.,
6 ALL PROFESSIONAL HAWAII
7 REALTY, INC., STEVE M. WRIGHT
8 and CAROL WRIGHT
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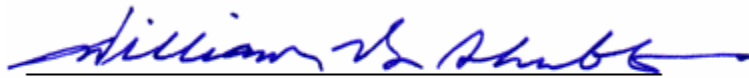
9 Dated: March 15, 2012

By: //s// Aaron Rudin

10 Aaron Rudin (SBN: 155554)
11 GORDON & REES LLP
12 Attorney for Plaintiff CENTURY 21
13 REAL ESTATE, LLC
14 GORDON & REES LLP
15 633 West Fifth Street, Suite 4900
16 Los Angeles, CA 90071
17 Phone: (213) 576-5000

15 **IT IS SO ORDERED.**

16 DATED: March 16, 2012

17 

18 WILLIAM B. SHUBB
19 UNITED STATES DISTRICT JUDGE