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7 DEPOSIT INSURANCE
CORPORATION as Receiver for
8 INDYMAC BANK, F.S.B.

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO

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13 FEDERAL DEPOSIT INSURANCE
CORPORATION as Receiver for
14 INDYMAC BANK, F.S.B.,

15 Plaintiff,

16 vs.

17 RICHARD K. VARRASSO dba
Richard Varrasso and Associates and
18 AppraisalTrust.com, an individual;
PREMIER VALLEY, INC. dba
19 CENTURY 21 M&M ASSOCIATES, a
California corporation; and KAREN
20 BHATTI, an individual,

21 Defendants,

22 And Related Cross-Actions
23

Case No. CIV. 2:11-2628 WBS CKD

**STIPULATION AND PROPOSED
ORDER TO MODIFY
SCHEDULING ORDER
REGARDING DISCOVERY
DEADLINE**

Honorable Carolyn K. Delaney

Trial: March 25, 2014

24
25 **STIPULATION**

26 Pursuant to this Court's Order regarding the scheduling of the above-
27 referenced action, (Docket No. 88 dated January 31, 2013), the deadline to
28 complete discovery, including expert discovery is October 29, 2013, the final

1 pretrial conference is scheduled for January 21, 2014 and the trial is scheduled
2 for March 25, 2014. Pursuant to the Court's order, the parties have disclosed
3 experts and rebuttal experts. While the parties have noticed depositions to be
4 completed this month, they believe that the matter is ripe for mediation and
5 would prefer to do so before expending additional sums to prepare for trial.

6 Therefore, the parties¹ hereby stipulate and seek leave of Court to continue
7 the deadline to complete discovery to December 20, 2013, to allow the parties to
8 mediate the case and complete discovery, if so necessary.

9 No other provision of the Pretrial Scheduling Order is to be modified at
10 this time.

11 **IT IS SO STIPULATED.**

12
13 DATED: October 18, 2013

GCA LAW PARTNERS LLP

14
15 By: /s/ Susan Condon
16 SUSAN CONDON
17 Attorney for Plaintiff FEDERAL
18 DEPOSIT INSURANCE
19 CORPORATION as RECEIVER for
20 INDYMAC BANK, F.S.B.

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26 ¹ Cross-Defendant Sophie Reisiyannejad did not respond to the request to so stipulate. Plaintiff's counsel,
27 Susan Condon, was contacted by Ms. Reisiyannejad in mid-September and advised that she would be
28 traveling to Iran on or about October 10, 2013 to care for a family member for a month or two.
Nevertheless, on the morning of October 18, 2013, Ms. Condon phoned Ms. Reisiyannejad and left a
message for Ms. Reisiyannejad, but did not get a response. Counsel for Defendants, Cory Chartrand,
emailed Ms. Reisiyannejad on October 17, 2013 and did not get a response. Therefore, the parties assume
she is currently in Iran.

1 DATED: October 18, 2013

TRIEBSCH & FRAMPTON

2
3 By: /s/ Cory B. Chartrand

CORY B. CHARTRAND

4 Attorneys for Defendants, PREMIER
5 VALLEY, INC., DBA CENTURY
6 21 M&M AND ASSOCIATES, and
7 KAREN BHATTI

(as Authorized on October 18, 2013)

8 DATED: October 18, 2013

Richard Varrasso

9
10 By: /s/ Richard Varrasso

Appearing Pro Se

11 (as Authorized on October 18, 2013)

12
13 DATED: October 18, 2013

LAW OFFICES OF STEVEN MIYAKE

14
15 By: /s/ Steven S. Miyake

Steven S. Miyake

16 Attorneys for Cross-Defendant
17 JOSIE RICH

(as Authorized on October 18, 2013)

18
19 DATED: October 18, 2013

EMMANUEL KIM

20
21 By: /s/ Emmanuel Kim

Appearing Pro Se

22 (as Authorized on October 18, 2013)

23
24 DATED:

SOPHIE REISIYANNEJAD

25
26 By: Please see Footnote 1

Appearing Pro Se

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 21, 2013



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE