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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

12
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

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

**STIPULATION AND PROPOSED
ORDER TO MODIFY
SCHEDULING ORDER**

Honorable William B. Shubb

Trial: April 16, 2013

23
24 **STIPULATION**

25 The parties, Plaintiff Federal Deposit Insurance Corporation as Receiver
26 for IndyMac Bank, F.S.B. and Defendants Richard Varrasso, Premier Valley Inc.
27 dba Century 21 M&M Associates, and Karen Bhatti by and through their counsel
28 of record or personally hereby stipulate and agree to modify the Pretrial

1 Scheduling Order in this matter to extend the expert disclosure and discovery
2 cutoff dates. The Parties agree to extend the deadline for the disclosure of expert
3 witnesses and rebuttal witness by thirty days in order to accommodate the
4 calendar of Plaintiff's expert. In light of the fact that the new disclosure deadline
5 would coincide with the close of discovery, the parties also seek a thirty day
6 extension in which to complete discovery.

7 The current due dates for disclosure of initial experts and rebuttal experts
8 are August 31, 2012 and September 28, 2012, respectively. The deadline for
9 completion of discovery is currently October 26, 2012. The parties stipulate to
10 the dates of September 28, 2012 for the initial disclosure and October 26, 2012
11 for the rebuttal disclosure. They further stipulate to extend the discovery
12 deadline to November 30, 2012.

13 No other provision of the Pretrial Scheduling Order is to be modified.

14 **IT IS SO STIPULATED.**

15
16 DATED: August 30, 2012

GCA LAW PARTNERS LLP

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

24
25 DATED: August 30, 2012

TRIEBSCH & FRAMPTON

26 By: /s/ Cory B. Chartrand
27 CORY B. CHARTRAND
28 Attorneys for Defendants, PREMIER
VALLEY, INC., DBA CENTURY
21 M&M AND ASSOCIATES, and
KAREN BHATTI
(as Authorized on August 30, 2012)

1 DATED: August 30, 2012

Richard Varrasso

2 By: /s/ Richard Varrasso

3 Appearing Pro Se

4 (as Authorized on August 30, 2012)

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9 DATED: August 31, 2012

10 

11 WILLIAM B. SHUBB

12 UNITED STATES DISTRICT JUDGE