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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

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24 **STIPULATION**

25 In light of Defendants' Motion for Leave to File a Third Party Complaint
26 and to Amend the Scheduling Order (Document 61) and Plaintiff's Notice of
27 Non-Opposition to the same (Document 62), the parties, Plaintiff Federal
28 Deposit Insurance Corporation as Receiver for IndyMac Bank, F.S.B. and

1 Defendants Richard Varrasso, Premier Valley Inc. dba Century 21 M&M
2 Associates, and Karen Bhatti by and through their counsel of record or
3 personally hereby stipulate and agree to modify the Pretrial Scheduling Order in
4 this matter to extend the expert disclosure and discovery cutoff dates. Given that
5 the information to be reviewed by the experts, as well as the scope of their
6 opinions will increase if Defendants' motion is granted, the Parties agree to
7 extend the deadline for the disclosure of expert witnesses until after the motion is
8 determined.

9 The Court agreed to continue the disclosure of experts and rebuttal experts
10 to September 28, 2012 and October 26, 2012 (Document 60). In light of the
11 Defendants' motions, the parties respectfully request that they be permitted to
12 disclose experts on November 30, 2012 and December 31, 2012, respectively.
13 They further stipulate to extend the discovery deadline from November 30, 2012
14 to January 31, 2013.

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

16 **IT IS SO STIPULATED.**

17
18 DATED: September 24, 2012

GCA LAW PARTNERS LLP

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20 By: /s/ Susan Condon

SUSAN CONDON

21 Attorney for Plaintiff FEDERAL
22 DEPOSIT INSURANCE
23 CORPORATION as RECEIVER for
24 INDYMAC BANK, F.S.B.
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DATED: September 24, 2012

TRIEBSCH & FRAMPTON

By: /s/ Cory B. Chartrand

CORY B. CHARTRAND

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

(as Authorized on September 24,
2012)

DATED: September 26, 2012

Richard Varrasso

By: /s/ Richard Varrasso

Appearing Pro Se

(as Authorized on September 26,
2012)

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 26, 2012



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE