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14   UNITED STATES DISTRICT COURT

15   EASTERN DISTRICT OF CALIFORNIA

16

17 Alexandra Nicholson,   )   No. 2:11-cv-03018-GEB-KJN
)
18   Plaintiff,   )   **Stipulation and [Proposed] Order**
)   **Continuing Dates Set in Scheduling**
19 v.   )   **Order**
)
20 Allstate Insurance Company, et al.,   )
)
21   Defendants.   )
   _____)
22

23   The Parties, by and through their respective counsel of record, hereby stipulate and agree as

24 follows and respectfully request the Court approve and give effect to their stipulation:

25   1.   On October 9, 2012, Ronald C. Schwarzkopf, of Schwarzkopf Law, substituted in as

26 counsel for Plaintiff Alexandra Nicholson in place of her former attorney, Jon S. Allin, formerly of

27 Schwarzkopf & Allin. At that time, Mr. Allin was winding up his practice and commencing a

28 position with the California Attorney General's Office.

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2.	On Friday, December 7, 2012, Ralph E. Laird, of Mackenroth & Laird, LLP, substituted in as counsel for Plaintiff Alexandra Nicholson in place of her former attorney, Ronald C. Schwarzkopf.

3.	On Monday, December 10th and Tuesday, December 11th of 2012, counsel for the parties discussed the dates and deadlines of the scheduling order at length in an effort to agree on new proposed dates and deadlines in order to allow additional time for disclosure of experts, for completion of discovery, and to file motions. In particular, counsel for the parties discussed additional discovery to take place before experts are disclosed, having the discovery completion deadline approximately two months before the deadline to hear motions, and having the Final Pretrial Conference take place at least two months after the deadline to hear motions.

4.	The existing scheduling order dates are as follows:

Initial expert witnesses disclosed by:	December 31, 2012
Rebuttal experts disclosed by:	January 31, 2013
All discovery completed by:	April 1, 2013
Last hearing date for motions:	June 3, 2013
Final Pretrial Conference:	August 12, 2013
Trial to commence:	October 22, 2013

NOW, THEREFORE, IT IS AGREED AND STIPULATED THAT good cause exists to continue the above events to the following dates:

Initial expert witnesses disclosed by:	March 29, 2013
Rebuttal experts disclosed by:	April 26, 2013
All discovery completed by:	June 29, 2013
Last hearing date for motions:	August 29, 2013
Final Pretrial Conference:	November 11, 2013
Trial to commence:	January 20, 2014

1   Dated: December 13, 2012   MACKENROTH & LAIRD LLP

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3   By: */s/ Ralph E. Laird*
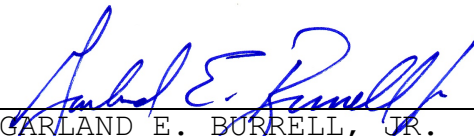   Ralph E. Laird
4   Attorneys for Plaintiff
                                                         Alexandra Nicholson
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6   Dated: December 13, 2012   SNR DENTON US LLP

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8   By: */s/ Jeffry Butler (as authorized on 12/13/12)*
                                                         Jeffry Butler
9   Attorneys for Defendant
                                                         Allstate Insurance Company
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12   IT IS SO ORDERED except since two of the proposed dates are court holidays and one is
    not an available hearing date for law and motion, the last hearing date for motions is rescheduled for
13 August 26, 2013, at 9:00 a.m. and the pretrial conference is rescheduled for November 4, 2013, at
    11:00 a.m. A joint pretrial statement shall be filed seven days prior to the hearing. The trial is
14 rescheduled for January 28, 2014, at 9:00 a.m.

15 Dated: December 13, 2012

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17   _____
                                                    GARLAND E. BURRELL, JR.
18   Senior United States District Judge

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Stipulation and [Proposed] Order Continuing Dates Set in Scheduling Order