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10		
11	UNITED STATES DISTRICT COURT	
12	EASTERN DISTRICT OF CALIFORNIA	
13	DONALD ANDERSON, et al.,	CASE NO. 2:12-CV-01057-MCE DAD
14	Plaintiffs,	STIPULATION TO AMEND THE
15	VS.	SCHEDULING ORDER TO CONTINUE DATES FOR DESIGNATION OF
16	CENTURY SURETY COMPANY, et al.,	EXPERTS AND PRESENTATION OF EXPERT REPORTS AND FOR
17	Defendants.	DISPOSITIVE MOTIONS; PROPOSED ORDER
18	/	
19	Pursuant to Federal Rules of Civil Proce	edure, Rule 29(b), the parties hereby stipulate an

Pursuant to Federal Rules of Civil Procedure, Rule 29(b), the parties hereby stipulate and request that the Court continue the dates for designation of experts and presentation of expert reports, and the last date for hearing dispositive motions. The current order sets the date for expert designation and presentation of expert reports by September 12, 2013, and the date for hearing all dispositive motions by January 23, 2014. The parties request that the date for the designation of experts and presentation of expert reports be continued to October 28, 2013, and the date for hearing all dispositive motions be continued to March 4, 2014.

The request is made on the grounds that one of Plaintiffs' experts has a family emergency which has required him to leave the state for the next 15-30 days, and he will be unavailable for business matters. The request is made on the further grounds that the parties require completion

Stipulation to Continue Dates

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of expert reporting and depositions in order to prepare motions for summary judgment and
oppositions to same. Continuance of the expert reporting deadline without a commensurate
continuance of the dispositive motion hearing deadline will prejudice the parties' ability to make
and oppose dispositive motions.

5 6	Dated: August 28, 2013	Van Dyke Law Group, A Professional Corporation
7 8		By:/S/
9 10	Dated: August 30, 2013	Attorneys for Plaintiffs Hansen Kohls Sommer & Jacob
11 12		By: /S/ DANIEL KOHLS, Attorneys for Plaintiffs
13 14	Dated: August 30, 2013	Wools & Peer, A Professional Corporation
15 16 17		By: /S/ H. DOUGLAS GALT, DAPHNE SUBAR, Attorneys for Defendant CENTURY SURETY COMPANY
18 19	Dated: August 30, 2013	CENTURY SURETY COMPANY Hines Carder, Attorneys at Law
20 21 22		By:/S/ MARC HINES MICHELLE CARDER MEGAN LIEBER
23 24		Attorneys for Defendant NATIONWIDE MUTUAL INS. COMPANY
25		
26 27 28		
20	Stipulation to Continue Dates	-2- Anderson v Century Surety, et al.

1	ORDER		
2	The parties, having stipulated and requested that the Court continue the dates for		
3	designation of experts and presentation of expert reports, and the last date for hearing dispositive		
4	motions, due to the unavailability of Plaintiffs' expert;		
5	The current order sets the date for expert designation and presentation of expert reports by		
6	September 12, 2013, and the date for hearing all dispositive motions by January 23, 2014.		
7	GOOD CAUSE APPEARING, the parties' request that the date for the designation of		
8	experts and presentation of expert reports be continued to October 28, 2013, and the date for		
9	hearing all dispositive motions be continued to March 4, 2014 is granted. Accordingly, the		
10	March 20, 2014 Final Pretrial Conference and May 12, 2014 Jury Trial are vacated. An		
11	Amended Pretrial Scheduling Order will be forthcoming.		
12			
13	IT IS SO ORDERED.		
14			
15	DATED: September 10, 2013		
16	Malan 18 1.		
17	MORRISON C. ENGLAND, JR.) UNITED STATES DISTRICT JUDGE		
18	UNITED STATES DISTRICT JUDGE		
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	Stipulation to Continue Dates -3- Anderson v Century Surety, et al.		