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11 Attorneys for Defendant
 12 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA

13
 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA
 16 (SACRAMENTO DIVISION)

17 DONALD HOLLAND,
 18
 Plaintiff,
 19
 vs.
 20

21 NATIONAL UNION FIRE INSURANCE
 22 COMPANY OF PITTSBURGH, PA,
 23
 Defendant.

CASE NO. 2:12-cv-01983-TLN-AC

**STIPULATION AND REQUEST FOR
 CHANGE IN SCHEDULING ORDER;
 ORDER**

24
 25 The parties have been working diligently toward moving this case forward in an efficient,
 26 expeditious manner. The parties wish to litigate this matter in a cost effective manner and avoid
 27 unnecessary attorney fees and costs.

28 The parties have identified key legal issues that are suited for resolution on cross motions

1 for summary judgment. The parties wish to minimize their respective costs for expert witnesses
2 until after the cross motions for summary judgment have been resolved by the Court.

3 The parties expect to file their respective cross motions for summary judgment at least eight
4 weeks in advance of April 24, 2014, which is an open hearing date according to the Court's website.
5 The parties intend to designate April 24, 2014 as the hearing date for the cross motions.

6 Pursuant to the Court's September 4, 2013 Order on the parties' Stipulation Re: Change In
7 Scheduling Order (Dkt 30), expert disclosures currently are scheduled for February 7, 2014. For the
8 reasons set forth above, the parties have agreed to submit this Stipulation and Proposed Order
9 continuing the expert disclosure deadline to May 16, 2014.

10 The parties recognize the need to maintain compliance with the Court's Pretrial Scheduling
11 Order and online practices to afford adequate time between the applicable deadlines. The parties
12 believe that revising the expert disclosure date as set forth above will not require the revision of any
13 other dates or deadlines. The parties specifically have discussed the July 14, 2014 deadline to file
14 the Joint Final Pretrial Conference Statement, and have agreed that the changing of the expert
15 disclosure date will not interfere with their ability to file that document in a timely manner.
16 However, if the Court determines that other dates or deadlines need to be revised, the parties are
17 willing to accept the Court's determination in that regard.

18
19 **IT IS HEREBY AGREED AND STIPULATED** by and between Plaintiff Donald Holland
20 and Defendant National Union Fire Insurance Company of Pittsburg, PA, through their designated
21 counsel, and subject to approval by the court, that the Court's Pretrial Scheduling Order be
22 amended to provide for Expert Disclosure on May 16, 2014. All other dates and deadlines set forth
23 in the Court's Pretrial Scheduling Order shall remain unchanged.

24 Dated: February 6, 2014

LAW OFFICE OF DANIEL S. GLASS

25
26 By /S/ Daniel S. Glass

DANIEL S. GLASS
Attorney for Plaintiff
DONALD HOLLAND

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Dated: February 6, 2014

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

By /S/ Stephen P. Ellingson
STEPHEN M. HAYES
STEPHEN P. ELLINGSON
Attorneys for Defendant
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA


ORDER

Based on the aforesaid Stipulation, and good cause appearing to exist,

IT IS SO ORDERED:

1. Expert Disclosure date: May 16, 2014;

Dated: February 10, 2014



Troy L. Nunley
United States District Judge