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17 Attorney for Plaintiff, Richard A. Pinn

18 UNITED STATES DISTRICT COURT  
 19 EASTERN DISTRICT OF THE STATE OF CALIFORNIA

20 RICHARD A. PINN,	)	CASE NO. 2:13-cv-1820-TLN AC
	)	
21 Plaintiff,	)	STIPULATION AND ORDER TO
v.	)	MODIFY SCHEDULING ORDER TO
	)	CONTINUE THE DISCOVERY CUTOFF
22 FIDELITY NATIONAL INSURANCE	)	DATE FOR 90 DAYS
23 COMPANY; and DOES 1 through 30,	)	
24 inclusive,	)	
	)	
25 Defendants.	)	

26 **ALL PARTIES**, by and through their respective counsel, hereby stipulate and request  
 27 that the Court order a modification of the current Pretrial Scheduling Order to continue the  
 28 discovery cutoff date for an additional 90 days.

Although the parties have proceeded diligently to conduct discovery in this matter, there  
 remain several depositions that have not been able to be taken due to difficulty locating  
 witnesses, the availability of witnesses, and scheduling conflicts.

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By this request, the parties seek only to continue the discovery cutoff date and do not request that any other deadline in this case be continued, including the deadline for disclosure of expert witnesses, the deadline for the hearing of dispositive motions, the pretrial conference, or the trial itself. No prior request has been made for continuance in this matter.

Therefore, the parties agree and stipulate, and request that the Court approve a modification of the Scheduling Order to allow discovery to continue for an additional 90 days, or until December 30, 2014.

Respectfully submitted,

*/s/ William J. Brown, III*

Dated: September 23, 2014

\_\_\_\_\_  
WILLIAM J. BROWN, III  
Attorney for Plaintiff  
RICHARD A. PINN

Dated: September 23, 2014

LONGYEAR, O'DEA & LAVRA, LLP

*/s/ Gregory P. O'Dea*

By: \_\_\_\_\_  
GREGORY P. O'DEA  
Attorneys for Defendant,  
FIDELITY NATIONAL INSURANCE COMPANY

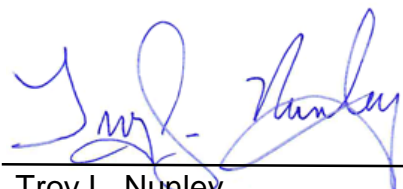
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**ORDER**

IT IS SO ORDERED:

The discovery cutoff is continued to December 30, 2014.

Dated: September 24, 2014

  
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Troy L. Nunley  
United States District Judge