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6 Attorneys for Defendant
NATIONWIDE MUTUAL INSURANCE
7 COMPANY, sued herein as "NATIONWIDE
AGRIBUSINESS INSURANCE COMPANY"
8

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 NATE WORTH,
12 Plaintiff,
13 v.

14 NATIONWIDE AGRIBUSINESS INSURANCE
COMPANY, AN IOWA CORPORATION
15 QUALIFIED TO DO BUSINESS IN
CALIFORNIA AKA NATIONWIDE MUTUAL
16 INSURANCE AKA ALLIED INSURANCE AND
DOES 1 THROUGH 100 INCLUSIVE,
17 Defendants.
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CASE NO. 2:14-CV-02068-GEB-AC
**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
COMPLETE MEDIATION PURSUANT
TO COURT'S VOLUNTARY DISPUTE
RESOLUTION PROGRAM**

Complaint Filed: July 28, 2014

19 Plaintiff NATE WORTH ("Plaintiff") and NATIONWIDE MUTUAL INSURANCE
20 COMPANY, sued herein as "NATIONWIDE AGRIBUSINESS INSURANCE COMPANY"
21 ("Defendant"), and collectively referred to hereinafter as "the Parties," by and through their
22 respective counsel of record stipulate as follows:

23 **RECITALS**

- 24 1. On May 18, 2015, the Parties agreed by stipulation to participate in mediation
25 pursuant to the Court's "Voluntary Dispute Resolution Program" ("VDRP").
26 2. On May 18, 2015, the Court ordered the Parties to participate in VDRP mediation.
27 3. On June 4, 2015, the Court appointed Richard Caufield to act as the neutral
28 attorney with respect the Parties' VDRP mediation.

1 4. Per the Court's Local Rule 271(j)(1), the Parties were to complete the VDRP
2 mediation no later than September 3, 2015.

3 5. However, due to the Parties' respective counsel's trial calendars and Mr. Caufield's
4 request that the mediation be held on a Friday, the Parties cannot complete the mediation prior to
5 the September 3, 2015. In consultation with Mr. Caufield, counsel for the Parties are endeavoring
6 to schedule the mediation for Friday, October 2, 2015, or Friday, October 16, 2015.

7 **STIPULATION**

8 WHEREFORE, the Parties, by and through their respective counsel of record, hereby
9 stipulate as follows:

10 That the Parties, jointly, by and through their respective counsel of record, request that the
11 Court extend the deadline for the Parties to complete mediation pursuant to VDRP, presently set
12 for September 3, 2015, an additional 90 days to December 2, 2015.

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Respectfully submitted,

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Dated: July __, 2015

Law Office of James L. Brunello

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By _____

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James L. Brunello

Karen Pine

Attorneys for Plaintiff

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NATE WORTH

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Dated: July __, 2015

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By _____

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Julian J. Pardini

Stephen J. Liberatore

Attorneys for Defendant

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NATIONWIDE MUTUAL INSURANCE

COMPANY, sued herein as "NATIONWIDE

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AGRIBUSINESS INSURANCE COMPANY"

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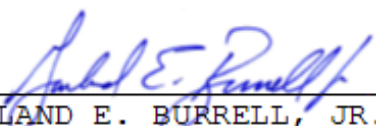
ORDER

Having read and considered the Parties' stipulation, set forth above,

THE COURT HEREBY ORDERS that the deadline for the Parties to complete mediation pursuant to the Court's Voluntary Dispute Resolution Program be, and hereby is, **EXTENDED to December 2, 2015.**

IT IS SO ORDERED.

Dated: July 28, 2015



GARLAND E. BURRELL, JR.
Senior United States District Judge