1 2 3 4 5 6 7 8 9	COX, WOOTTON, LERNER, GRIFFIN & HANSEN LLP Richard C. Wootton (Cal. Bar No. 88390) Mark E. Tepper (Cal. Bar No. 275902) 900 Front Street, Suite 350 San Francisco, CA 94111 Telephone No.: 415-438-4600 Facsimile No.: 415-438-4601 Email: rwootton@cwlfirm.com Email: mtepper@cwlfirm.com Attorneys for Defendant/Cross-defendant, VORTEX MARINE CONSTRUCTION, INC. UNITED STATES D FOR THE EASTERN DIST	
11 12 13 14 15 16 17	WILLIAM GEORGE HARTUNG; ROBERT LOUIS HARTUNG, Plaintiffs, v. VORTEX MARINE CONSTRUCTION, INC., GARY PAUL VELLA; DOES 1-10 Defendants. And related cross actions.	Case No.: 2:15-cv-01034-WBS-AC STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT DISCLOSURE DEADLINE
20 21 22 23 24 25 COX, WOOTTON, LERNER, GRIFFIN & HANSEN LLP 26 900 FRONT STREET, SUITE 350 SAN FRANCISCO, CA 94111 TEL: 415-438-4601 FAX: 415-438-4601 27 28	WHEREAS, the current deadline to complete expert disclosures pursuant to F.R.C.P. 26 is set for February 15, 2016, with rebuttal expert disclosures due one month later; WHEREAS, the current deadline to complete all discovery, including expert discovery, is set for May 31, 2016; WHEREAS, despite the diligence of the parties, substantial fact discovery necessary for the parties' experts to prepare and disclose meaningful reports has yet to be completed, including at least ten (10) depositions. The necessary discovery cannot be completed by February 15, 2016. It is anticipated that the necessary fact discovery will be completed by	

1	April 1, 2016. Accordingly, the parties agree good cause exists to extend the deadline to	
2	disclose experts to April 15, 2016, and rebuttal experts to May 16, 2016.	
3	WHEREAS, the new expert disclosure deadlines would afford the parties over two	
4	(2) months to complete expert discovery. However, in light of the number of expert	
5	witnesses anticipated to be called in this case, the parties agree that a discovery cutoff date	
6	of July 1, 2016 would be more app	propriate. This would place the discovery cutoff deadline
7	over four (4) months in advance of trial, currently set for November 15, 2016. The parties	
8	do not wish to alter the trial date;	
9	NOW, THEREFORE, the parties hereby stipulate and agree that the deadline to	
10	disclose experts shall be extended to April 15, 2016, the deadline to disclose rebuttal	
11 12	experts shall be extended to May 16, 2016, and the discovery cutoff deadline shall be	
13	extended to July 1, 2016, pending the Court's approval.	
14	IT IS SO STIPULATED.	
15		
16	Dated: February 4, 2016	LAW OFFICES OF MARK S. NELSON Attorney for Plaintiffs,
17		William Hartung and Robert Hartung
18		By:/s/ Mark S. Nelson
19		·
20	Dated: February 4, 2016	COX, WOOTTON, LERNER
21		GRIFFIN & HANSEN LLP Attorneys for Defendant/Cross-defendant,
22		Vortex Marine Construction, Inc.
23		By: /s/ Mark E. Tepper
24		
cox, wootton,	Dated: February 4, 2016	DEMLER, ARMSTRONG & ROWLAND, LLP
LERNER, GRIFFIN & HANSEN LLP 26 900 FRONT STREET, SUITE 350 SAN FRANCISCO, CA		Attorneys for Defendant/Cross-defendant, Gary Vella
94111 TEL: 415-438-4600 FAX: 415-438-4601		Cary . Car
28		By: /s/ Paul M. Bessette
		-2- Case No. 2:15-cv-01034-WBS-AG

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HANSEN LLP

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CERTIFICATE OF SIGNATURES

I attest that the content of this document is acceptable to attorneys Mark S. Nelson and Paul M. Bessette, and that each of them has authorized me to sign this document on their behalf.

[PROPOSED] ORDER

Pursuant to Paragraph IX of the Status (Pretrial Scheduling) Order (ECF No. 14), and the parties' stipulation, it is hereby ORDERED that the current deadline for expert disclosures shall be vacated and reset for April 15, 2016, with rebuttal expert disclosures reset for May 16, 2016. It is further ORDERED that the current discovery cutoff deadline shall be vacated and reset for July 1, 2016.

IT IS SO ORDERED.

DATED: February 8, 2016

auson Clane UNITED STATES MAGISTRATE JUDGE