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 12 VORTEX MARINE CONSTRUCTION, INC.

13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

15 WILLIAM GEORGE HARTUNG; ROBERT
 16 LOUIS HARTUNG,

17 Plaintiffs,

18 v.

19 VORTEX MARINE CONSTRUCTION,
 20 INC., GARY PAUL VELLA; DOES 1-10

21 Defendants.

Case No.: 2:15-cv-01034-WBS-AC

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING EXPERT
 DISCLOSURE DEADLINE**

22 And related cross actions.

23 WHEREAS, the current deadline to complete expert disclosures pursuant to
 24 F.R.C.P. 26 is set for February 15, 2016, with rebuttal expert disclosures due one month
 25 later;

26 WHEREAS, the current deadline to complete all discovery, including expert
 27 discovery, is set for May 31, 2016;

28 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

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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



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

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