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9 Attorneys for Plaintiffs and Counter-Defendant  
 WAKE FOREST ACQUISITIONS, L.P. c/o  
 10 Corporation Service Company; SHAFFER ASSET  
 MANAGEMENT CORPORATION c/o Corporation  
 11 Service Company; ROBERT P. SHAFFER,  
 individually and as Co-Trustee of the Robert P.  
 12 Shaffer Revocable Trust; and MARY SHAFFER, as  
 Co-Trustee of the Robert P. Shaffer Revocable Trust

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

16 WAKE FOREST ACQUISITIONS, L.P.;  
 17 SHAFFER ASSET MANAGEMENT  
 CORPORATION; ROBERT P.  
 18 SHAFFER, individually and as Co-Trustee  
 of the Robert P. Shaffer Revocable Trust;  
 19 and MARY SHAFFER, as Co-Trustee of  
 the Robert P. Shaffer Revocable Trust,

CASE NO. 2:15-CV-02167-KJM-AC

**STIPULATION AND ORDER TO EXTEND  
 FACT DISCOVERY CUTOFF DATE**

Judge: Hon. Kimberly J. Mueller

20 Plaintiffs,

21 v.

22 VANDERBILT COMMERCIAL  
 23 LENDING, INC.; and GREGORY COOK,

24 Defendants.

25 VANDERBILT COMMERCIAL  
 LENDING, INC.

26 Counterclaim-Plaintiff,

27 v.  
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1 WAKE FOREST ACQUISITIONS, L.P.,  
2 Counterclaim-Defendant.

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4 WHEREAS, on June 21, 2016, the Status (Pretrial Scheduling) Order (“Scheduling  
5 Order”) was entered on the Docket (Dkt. No. 30);

6 WHEREAS, pursuant to the Court’s Scheduling Order, all fact discovery shall be  
7 completed in this case by March 10, 2017;

8 WHEREAS, counsel for Defendant Gregory Cook has advised the parties of Mr. Cook’s  
9 health problems, and Mr. Cook’s health problems have affected the parties’ ability to schedule  
10 depositions prior to the current discovery cutoff date;

11 WHEREAS, the parties wish to continue the fact discovery cutoff date without impacting  
12 the dates currently set for the Final Pretrial Conference and Trial in this case;

13 THEREFORE, since the parties will not be able to complete fact discovery by the current  
14 cutoff date, the parties hereby agree and stipulate that, subject to the Court’s approval, the fact  
15 discovery cutoff date shall be extended through and including June 29, 2017 to allow the parties  
16 to complete their fact discovery in this case.

17 Dated: February 27, 2017

HOPKINS & CARLEY  
A Law Corporation

19  
20 By: /s/ Maria S. Bellafronto  
21 Maria S. Bellafronto  
22 Monique D. Jewett-Brewster  
Attorneys for Plaintiffs and Counter-  
Defendant

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Dated: February 27, 2017

BOUTIN JONES INC.

By: /s/ Eric Miller  
Robert D. Swanson, Esq.  
Kelley M. Lincoln, Esq.  
Eric Miller, Esq.  
Attorneys for Defendant Gregory Cook and  
Defendant and Counterclaim-Plaintiff  
VANDERBILT COMMERCIAL  
LENDING, INC.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May 15, 2017.

  
UNITED STATES DISTRICT JUDGE