1 ARTHUR G. WOODWARD (Cal. SBN 142914) REYNOLDS MADDUX WOODWARD LLP 2 500 Auburn Folsom Road, Suite 210 3 Auburn, CA 95603 Telephone: (530) 885-8500 4 Facsimile: (530) 885-8113 5 Email: awoodward@rmwlawllp.com 6 Attorneys for Defendant K.O.O. CONSTRUCTION, INC. 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 UNITED STATES GOVERNMENT FOR Case No.: 2:16-cv-00478-TLN-KJN 11 THE USE AND BENEFIT OF AVCON STIPULATION TO EXTEND CONSTRUCTORS, INC., 12 DISCOVERY DEADLINES AND 13 Plaintiff, ORDER THEREON 14 v. 15 K.O.O CONSTRUCTION INC.; 16 TRAVELERS CASUALTY AND SURETY COMPANY; and DOES 1-50 17 Defendants. 18 19 The parties to this action hereby stipulate and agree to extend the discovery 20 cutoff dates in this action for 60 days. Good cause exists for doing so, because the 21 parties are actively pursuing mediation in this case and having to undertake 22 discovery while doing so would impede mediation efforts. 23 The deadline to complete discovery, as set forth in the Court's Pre-Trial 24 Scheduling Order dated January 20, 2017 (Docket no. 15) at page 2, lines 3-8, is 25 therefore stipulated to be continued from November 17, 2017 to January 16, 2018. 26 The deadline for designating expert witnesses as set forth Court's January 20, 2017 27 Pre-Trial Scheduling Order at page 2, line 14 to page 4, line 18 is stipulated to be 28 STIPULATION TO EXTEND DISCOVERY DEADLINES AND ORDER

1	continued from January 16, 2018 to March 19, 2018.		
2			
3	Dated:	October 13, 2017	BORBA FRIZZELL KERNS
4			By: /s/ John Borba as authorized 10/13
5			John Borba
6			Attorneys for Plaintiff
7			UNITED STATES GOVERNMENT for the use and benefit of AVCON
8			CONSTRUCTORS, INC.
9			
10	Dated:	October 13, 2017	REYNOLDS MADDUX & WOODWARD
11			By: /s/ Arthur Woodward
12			Arthur Woodward
13			
14			Attorneys for Defendant K.O.O. CONSTRUCTION, INC.
			R.O.O. CONDINCTION, INC.
15			
15 16	Dated:	October 13, 2017	SMTD LAW LLP
	Dated:	October 13, 2017	
16	Dated:	October 13, 2017	SMTD LAW LLP By:/s/Michael J. Timpane as authorized 10/13
16 17	Dated:	October 13, 2017	By:/s/Michael J. Timpane <i>as authorized</i> 10/13 Michael J. Timpane
16 17 18	Dated:	October 13, 2017	By:/s/Michael J. Timpane <i>as authorized</i> 10/13
16 17 18 19	Dated:	October 13, 2017	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant
16 17 18 19 20	Dated:	October 13, 2017	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans
16 17 18 19 20 21	Dated:	October 13, 2017	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND
16 17 18 19 20 21 22		October 13, 2017 O ORDERED.	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND
16 17 18 19 20 21 22 23	IT IS S		By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
16 17 18 19 20 21 22 23 24	IT IS S	O ORDERED.	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND
16 17 18 19 20 21 22 23 24 25	IT IS S	O ORDERED.	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
16 17 18 19 20 21 22 23 24 25 26	IT IS S	O ORDERED.	By:/s/Michael J. Timpane as authorized 10/13 Michael J. Timpane Edward R. Stepans Attorney for Defendant TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA Troy L. Nunley

STIPULATION TO EXTEND DISCOVERY DEADLINES AND ORDER