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Attorneys for Defendants/Cross-Defendants/Counter-Claimants
URBANA TAHOE TC LLC and
URBANA TAHOE BEVERAGE COMPANY, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ELENA TYURINA,

Plaintiff,

vs.

URBANA TAHOE TC LLC; URBANA
TAHOE BEVERAGE COMPANY, LLC
dba Beach Retreat and Lodge
Tahoe,

Defendants.

Case No.: 2:16-cv-00759-TLN-DB

**STIPULATION AND ORDER TO
EXTEND THE CLOSE OF NON-
EXPERT DISCOVERY AND TO
EXTEND THE EXPERT
DISCLOSURE CUTOFF DATE**

COMPLAINT FILED: 04/13/16
TRIAL DATE: 07/16/18

AND RELATED CROSS-CLAIMS

Subject to the approval of this Court, the parties hereby stipulate to
extend the deadline for the disclosure of expert witnesses from December

1 11, 2017 to January 31, 2018, with the deadline to designate supplemental
2 expert witnesses to be set twenty (20) days thereafter.

3 The parties further stipulate to extend the close of non-expert
4 discovery from November 30, 2017 to December 29, 2017. The parties
5 have previously requested one additional extension for the discovery cutoff
6 and for the expert disclosure deadline.

7 This case has involved multiple depositions in various locations
8 throughout the country. The parties have been diligently pursuing such
9 discovery. There remain some additional fact witnesses to be deposed in
10 addition to plaintiff's treating health care providers in Minnesota. Despite
11 their diligence, the parties are still in the midst of completing fact
12 discovery. The parties accordingly wish to postpone the non-expert
13 discovery cutoff and to postpone the expert disclosure deadline to allow
14 time to process evidence expected from the continued fact discovery
15 before confirming their selection of experts and submitting their expert
16 reports.

17 The parties do not request any change or extension of any other
18 previously established dates in the Court's Scheduling Order of August 29,
19 2016.

20 Trial in this matter is set for July 16, 2018 and thus an amended
21 expert disclosure deadline would still comport with the requirement that
22 expert disclosures be made 90 days before trial. Fed. R. Civ. P.
23 26(a)(2)(D). The parties do not request any change or extension of any
24 other previously established dates in the Court's Scheduling Order of
25 August 29, 2016.

26 SO STIPULATED.

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4 Dated: November 14, 2018

RUSHFORD & BONOTTO, LLP

5 By: /s/ James W. Rushford

6 JAMES W. RUSHFORD

7 Attorneys for Defendants, URBANA
8 TAHOE TC LLC and URBANA TAHOE
9 BEVERAGE COMPANY, LLC dba Beach
10 Retreat and Lodge Tahoe

11 Dated: November 14, 2018

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19 Dated: November 14, 2018

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20 SCHOENBERGER**

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23 VALERIE N. ROSE (SBN 272566)

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25 Dated: November 14, 2018

**DREYER BABICH BUCCOLA WOOD
26 CAMPORA, LLP**

27 By: /s/ Roger A. Dreyer

28 ROGER A. DREYER (SBN 95462)

Attorneys for Plaintiff, ELENA TYURINA

Dated: November 14, 2018

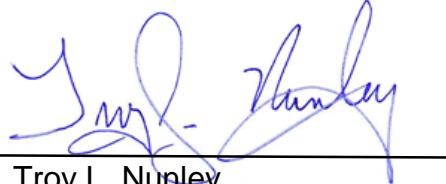
PAGLIERO & ASSOCIATES

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By: /s/ James R. Pagliero
JAMES R. PAGLIERO (SBN 95898)
Attorneys for Defendant, ACTION
MOTORSPORTS OF TAHOE, INC.

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

Dated: **12/01/2017**



Troy L. Nunley
United States District Judge