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13 *Attorneys for Defendants,*  
*Patriot National, Inc., Patriot Risk Services, Inc.,*  
 14 *Patriot Claim Services, Inc., and*  
 15 *Patriot Risk Consultants, Inc.*

16 UNITED STATES DISTRICT COURT  
 17 EASTERN DISTRICT OF CALIFORNIA

18 Tammy Lynn Logan, an individual,  
 19 Plaintiff,

20 vs.

21 Patriot National, Inc., a Delaware Corporation;  
 Patriot Risk Services, Inc., a Delaware  
 22 Corporation; Patriot Claim Services, Inc., a  
 Delaware Corporation; Patriot Risk  
 23 Management, Inc., a Delaware Corporation; and  
 Does 1 through 50, inclusive,  
 24 Defendants.

Case No. 16-cv-01407-MCE-CKD

**JOINT STIPULATION AND ORDER  
 EXTENDING DISCOVERY  
 DEADLINES**

Date Filed: April 22, 2016  
 Trial Date: None set.

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1 Pursuant to Local Rule 143 and the Court’s June 22, 2016 Initial Pretrial Scheduling  
2 Order (Dkt. #2), Plaintiff Tammy Lynn Logan (“Plaintiff”) and Defendants Patriot National,  
3 Inc., Patriot Risk Services, Inc., Patriot Claim Services, Inc., and Patriot Risk Consultants, Inc.,  
4 erroneously sued as “Patriot Risk Management, Inc.” (collectively, “Defendants”), by and  
5 through their counsel of record hereby stipulate and request that the Court enter and Order as  
6 follows:

7 WHEREAS, Plaintiff commenced this action on April 22, 2016 in the Superior Court of  
8 the State of California for the County of Sacramento [Dkt. #1, Exhibit A (“Complaint”)];

9 WHEREAS, Defendants removed this action to this Court on June 22, 2016 [Dkt. #1];

10 WHEREAS, on June 22, 2016 the Court issued an Initial Pretrial Scheduling Order,  
11 which scheduled deadlines for discovery, disclosure of expert witness and dispositive motions  
12 [Dkt. #2];

13 WHEREAS, the Court’s June 22, 2016 Initial Pretrial Scheduling Order set, *inter alia*,  
14 the following deadlines:

<b>Event</b>	<b>Date</b>
Fact Discovery	April 21, 2017
Initial Expert Disclosures	June 20, 2017
Rebuttal Expert Disclosures	July 20, 2017
Dispositive Motion Filing Deadline	October 18, 2017
Notice of Trial Readiness	30 days after receiving Court’s ruling on the last field dispositive motions

23 WHEREAS, Plaintiff has noticed the deposition of a number of Defendants’ employees  
24 who are located out-of-state and are not available prior to the fact discovery deadline;

25 WHEREAS, the parties require additional time to complete depositions and engage in  
26 other discovery after the depositions, if necessary;

27 WHEREAS, no trial date has been set for this case;

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1 WHEREAS, the proposed extension to the discovery and expert disclosure deadlines  
2 will not impact the trial date of this case or any other date involving the Court;

3 WHEREAS, the parties seek to extend by 60 days the fact discovery, initial expert  
4 disclosures and rebuttal expert disclosures deadlines as set by the Court's June 22, 2016 Initial  
5 Pretrial Scheduling Order and the parties do not seek to alter any of the other dates in the  
6 Court's June 22, 2016 Initial Pretrial Scheduling Order [Dkt. #2];

7 WHEREAS, in light of the above, good cause exists to extend the current discovery and  
8 expert disclosure schedule;

9 **NOW THEREFORE**, in consideration of the foregoing, the parties, by and through  
10 their undersigned counsel, hereby stipulate, agree and request that the Court enter an Order  
11 amending the discovery and expert disclosure deadlines in the Court's June 22, 2016 Initial  
12 Pretrial Scheduling Order as follows:

Event	Current Date	New Date
Fact Discovery	April 21, 2017	June 20, 2017
Initial Expert Disclosures	June 20, 2017	August 18, 2017
Rebuttal Expert Disclosures	July 20, 2017	September 18, 2017
Dispositive Motion Filing Deadline	October 18, 2017	No change.
Notice of Trial Readiness	30 days after receiving Court's ruling on the last field dispositive motions	No change.

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1 **IT IS SO STIPULATED.**

2 Dated: April 21, 2017

**ARIAS SANGUINETTI STAHLE & TORRIJOS, LLP**

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By: /s/ Alfredo Torrijos  
Mike Arias, Esq.  
Alfredo Torrijos, Esq.

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*Attorneys for Plaintiff  
Tammy Lynn Logan*

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8 Dated: April 21, 2017

**LITTLER MENDELSON**

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By: /s/ JoAnna L. Brooks (as authorized on April 21, 2017)  
JoAnna L. Brooks, Esq.  
Britney N. Torres, Esq.,

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*Attorneys for Defendant  
Patriot National, Inc., Patriot Risk Services, Inc.,  
Patriot Claim Services, Inc., and  
Patriot Risk Consultants, Inc.*

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IT IS SO ORDERED.

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Dated: April 24, 2017

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MORRISON C. ENGLAND, JR  
UNITED STATES DISTRICT JUDGE

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