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13 *Attorneys for Defendants,*
 14 *Patriot National, Inc., Patriot Risk Services, Inc.,*
 15 *Patriot Claim Services, Inc., and*
 16 *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;
 22 Patriot Risk Services, Inc., a Delaware
 23 Corporation; Patriot Claim Services, Inc., a
 24 Delaware Corporation; Patriot Risk
 25 Management, Inc., a Delaware Corporation; and
 26 Does 1 through 50, inclusive,
 27 Defendants.

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

**JOINT STIPULATION AND ORDER
 EXTENDING ALL PRETRIAL
 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 Management,
4 Inc. (collectively, “Defendants”), by and through their counsel of record hereby stipulate and
5 request that the Court enter and Order as follows:

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

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

9 WHEREAS, on June 22, 2016 the Court issued an Initial Pretrial Scheduling Order,
10 which scheduled pretrial deadlines [Dkt. #2];

11 WHEREAS, on April 21, 2017, Plaintiff and Defendants filed a Joint Stipulation and
12 [Proposed] Order Extending Discovery Deadlines [Dkt. #10];

13 WHEREAS, on April 24, 2017, the Court issued an Order Extending Discovery
14 Deadlines [Dkt. # 12], setting, *inter alia*, the following deadlines:

Event	Date
Fact Discovery	June 20, 2017
Initial Expert Disclosures	August 18, 2017
Rebuttal Expert Disclosures	September 18, 2017
Dispositive Motion Filing Deadline	October 18, 2017
Notice of Trial Readiness	30 days after receiving Court’s ruling on the last filed dispositive motion

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23 WHEREAS, Plaintiff has taken the depositions of six of Defendants’ employees who
24 are located out-of-state and Defendants have taken one day of Plaintiff’s deposition;

25 WHEREAS, the Parties are interested in mediating this case and need to extend pretrial
26 deadlines in order to allow sufficient time to do so;

27 WHEREAS, the Parties have agreed to proceed with private mediation based on the
28 discovery completed to date and believe that judicial economy is best served by extending the

1 pretrial deadlines, including the dispositive motion filing deadline, in order to allow sufficient
2 time to do so.;

3 WHEREAS, the Parties may require additional time to complete further depositions and
4 engage in other discovery;

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

6 WHEREAS, the Parties seek to extend by 120 days all pretrial deadlines (including the
7 fact discovery, initial expert disclosures, rebuttal expert disclosures, dispositive motion filing,
8 and notice of trial readiness deadlines) previously set by the Court;

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

11 **NOW THEREFORE**, in consideration of the foregoing, the parties, by and through
12 their undersigned counsel, hereby stipulate, agree and request that the Court enter an Order
13 amending the pretrial deadlines set forth in the Court's April 24, 2017 Order as follows:

Event	Current Date	New Date
Fact Discovery	June 20, 2017	October 18, 2017
Initial Expert Disclosures	August 18, 2017	December 18, 2017
Rebuttal Expert Disclosures	September 18, 2017	January 16, 2018
Dispositive Motion Filing Deadline	October 18, 2017	February 15, 2018
Notice of Trial Readiness	30 days after receiving Court's ruling on the last field dispositive motions	No change.

1 **IT IS SO STIPULATED.**

2 Dated: June 20, 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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Dated: June 20, 2017

LITTLER MENDELSON

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By: /s/ Britney N. Torres
JoAnna L. Brooks, Esq.
Britney N. Torres, Esq.,

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Attorneys for Defendants
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: June 23, 2017

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE

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