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

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

**JOINT STIPULATION AND ORDER
 EXTENDING DISCOVERY DEADLINE**

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

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1 Pursuant to Local Rule 143 and the Court’s Order Extending All Pretrial Deadlines
2 (Dkt. #14), Plaintiff Tammy Lynn Logan (“Plaintiff”) and Defendants Patriot National, Inc.,
3 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 an 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 parties sought and the Court approved the parties’ stipulation to extend
14 all pretrial deadlines to accommodate out of state depositions;

15 WHEREAS, the Court’s Order set, *inter alia*, the following deadlines:

Event	New Date
Fact Discovery	October 18, 2017
Initial Expert Disclosures	December 18, 2018
Rebuttal Expert Disclosures	January 16, 2018
Dispositive Motion Filing Deadline	February 15, 2018
Notice of Trial Readiness	30 days after receiving Court’s ruling on the last field dispositive

25 WHEREAS, the parties participated in mediation on October 10, 2017 and were unable
26 to reach a settlement;

27 WHEREAS the parties require additional time to continue negotiations, and to
28 complete discovery if negotiations are unsuccessful;

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

3 WHEREAS, the parties seek to extend by 30 days the fact discovery, and the parties do
4 not seek to alter any of the other dates in the Court's Order [Dkt. #14];

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

7 **NOW THEREFORE**, in consideration of the foregoing, the parties, by and through
8 their undersigned counsel, hereby stipulate, agree and request that the Court enter an Order
9 amending the fact discovery deadline in the Court's June 23, 2017 Order as follows:

Event	Current Date	New Date
Fact Discovery	October 18, 2017	November 17, 2017

12 **IT IS SO STIPULATED.**

13 Dated: October 18, 2017

ARIAS SANGUINETTI STAHL & TORRIJOS, LLP

14 By: /s/ Alfredo Torrijos _____
15 Mike Arias, Esq.
16 Alfredo Torrijos, Esq.
17 *Attorneys for Plaintiff*
18 *Tammy Lynn Logan*

19 Dated: October 18, 2017

LITTLER MENDELSON

20 /s/ Britney N. Torres _____
21 JoAnna L. Brooks, Esq.
22 By: Britney N. Torres, Esq.,
23 *Attorneys for Defendant*
24 *Patriot National, Inc., Patriot Risk Services, Inc.,*
25 *Patriot Claim Services, Inc., and*
26 *Patriot Risk Consultants, Inc.*

27 **IT IS SO ORDERED.**

28 Dated: October 30, 2017


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE