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13 *Attorneys for Defendants,*
 Patriot National, Inc., Patriot Risk Services, Inc.,
 14 Patriot Claim Services, Inc., and
 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 TO
 CONTINUE DISCOVERY AND
 DISPOSITIVE MOTION DEADLINES**

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 Discovery Deadlines (Dkt.
2 #17), Plaintiff Tammy Lynn Logan (“Plaintiff”) and Defendants Patriot National, Inc., Patriot
3 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 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 [Dkt. #14]:

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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 motions

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

1 WHEREAS the parties required additional time to continue negotiations, and to
2 complete discovery if negotiations are unsuccessful;

3 WHEREAS, the parties previously sought and the Court approved to extend by 30 days
4 the fact discovery deadline [Dkt. #17];

5 WHEREAS, the parties are still engaged in settlement discussions and need additional
6 time to continue negotiations, and to complete fact discovery and retain experts if negotiations
7 are unsuccessful;

8 WHEREAS, the proposed extension to the discovery will not impact the trial date of
9 this case;

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

12 **NOW THEREFORE**, in consideration of the foregoing, the parties, by and through
13 their undersigned counsel, hereby stipulate, agree and request that the Court enter an Order
14 amending the deadlines in the Court's October 30, 2017 Order as follows:

Event	Current Date	New Date
Fact Discovery	November 17, 2017	January 18, 2018
Initial Expert Disclosures	December 18, 2017	February 18, 2018
Rebuttal Expert Disclosures	January 16, 2018	March 16, 2018
Dispositive Motion Filing	February 15, 2017	April 16, 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: December 4, 2017

ARIAS SANGUINETTI STAHL & 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: December 4, 2017

LITTLER MENDELSON, PC

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By: /s/ Britney N. Torres
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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16 **IT IS SO ORDERED.**

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Dated: December 6, 2017

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MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE

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