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9 *Attorneys for Defendant*
 FORD MOTOR COMPANY

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA

12 DEREK RHODEHOUSE,

13 Plaintiff,

14 v.

15 FORD MOTOR COMPANY and DOES 1 TO
 16 20, Inclusive,

17 Defendants.

Case No. 2:16-cv-01892-JAM-CMK

**STIPULATION AND ORDER EXTENDING
 PENDING DATES BY 60 DAYS**

Complaint Filed: January 4, 2015
 1st Amended Complaint Filed: July 5, 2016
 2nd Amended Complaint Filed: December 21,
 2016

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 20 1. On August 10, 2016, Defendant Ford Motor Company removed this action from the
 21 Superior Court of California for the County of Trinity to the United States District Court, Eastern
 22 District of California.

23 2. On December 5, 2016, the Court granted in part, and denied in part, Ford's motion to
 24 dismiss the action.

25 3. On December 21, 2016, Plaintiff filed his second amended complaint.

26 4. On January 4, 2017, the Court issued its Status (Pre-Trial Scheduling) Order, setting
 27 various discovery deadlines and trial for May 21, 2018.

1 5. The parties have engaged in discovery cooperatively. Plaintiff has responded to
2 special interrogatories and requests for production. Defendant has deposed Plaintiff, who was a
3 passenger in the vehicle, Mark Suda, the driver of the vehicle, Kyle Martin, a friend of plaintiff, and
4 Tiffany Cato, his relationship. Ford will depose the California Highway Patrol officer who
5 responded to the incident next week. Plaintiff has served requests for admission, special
6 interrogatories, and two sets of requests for production to which responses are being prepared. The
7 parties have also agreed to a medical examination of Plaintiff without the necessity of motion.
8 Plaintiff has also noticed the depositions of two named Ford witnesses. After these depositions,
9 Plaintiff and Ford will meet and confer whether a general Ford deponent will also be noticed.

10 6. The main reason for the request for this amendment is based upon limitations related
11 by Plaintiff's counsel. Gene Tucker, who had worked for Plaintiff's attorney approximately 14 years,
12 unexpectedly died this past May. The last two months before his death were disruptive as he began
13 to have difficulty, but the terminal nature of his illness was not known. Plaintiff's counsel relates that
14 Mr. Tucker's unexpected death was troubling and difficult for both the professional and personal
15 void it created. Plaintiff's counsel returned early out-of-town upon learning of Mr. Tucker's death
16 and relates that he was required to step in and handle a number of personal issues regarding Mr.
17 Tucker. In addition, Plaintiff's counsel says he had to address the legal matters for which Mr. Tucker
18 had been responsible. Another issue for Plaintiff's counsel is Plaintiff's research assistant of over 22
19 years has retired recently (although he might possibly come back). This was a development which
20 occurred after Mr. Tucker's death. These events have contributed to significantly limiting the time
21 and ability of Plaintiff's counsel to focus on this case. Counsel for Plaintiff has no other attorney or
22 research assistant working for him at the moment and is in the process of advertising for an attorney
23 to assist him with his practice.

24 7. As such, the Parties hereby stipulate and respectfully request that this Court consider
25 the foregoing as good cause to amend the existing Pre-Trial Scheduling Order to continue all
26 pending dates by 60 days, to the following:

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- a. The parties shall make expert witness disclosures under Fed R. Civ. P. 26(a)(2) by December 18, 2017;
- b. Supplemental disclosure and disclosure of any rebuttal experts under Fed R. Civ. P. 26(a)(2)(c) shall be made by January 8, 2018;
- c. All discovery shall be completed by February 20, 2018;
- d. All dispositive motions shall be filed by April **10**, 2018;
- e. Hearing on such dispositive motions shall be on **May 8**, 2018 at 1:30 p.m. or as soon thereafter as this Court will permit;
- f. The final pre-trial conference be set for June **15**, 2018 at 10:00 a.m.; and
- g. Jury trial in this matter be set for July **23**, 2018 at 9:00 a.m., or as soon thereafter as this Court will permit.

Dated: September 28, 2017

Respectfully submitted,
 LAW OFFICES OF MICHAEL COGAN
 By: /s/ Michael Cogan (as authorized 9/28/17)
 Michael Cogan
 Attorney for Plaintiff
 DEREK RHODEHOUSE

Dated: September 28, 2017

SHOOK, HARDY & BACON L.L.P.
 By: /s/ Sandra L. Sheldon
 Amir Nassihi
 Sandra L. Sheldon
 Attorneys for Defendant
 FORD MOTOR COMPANY

Pursuant to Stipulation, it is so ordered **as modified by the Court.**

DATED: 9/29/2017

/s/ John A. Mendez
 United States District Court Judge