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 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA
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11 NATIONWIDE INSURANCE COMPANY OF
 12 AMERICA,

Case No.: 2:16-cv-01978-WHO

13 Plaintiff,

**STIPULATION FOR THE PARTIES TO
 MODIFY THE PRETRIAL SCHEDULE
 AND EXTEND DISCOVERY
 DEADLINES; ORDER**

14 v.

15 CYNTHIA MARQUEZ,

16 Defendant.

17 Judge: Hon. William H. Orrick
 18

19 Pursuant to Rules 16(b) (4) and 29 of the Federal Rules of Civil Procedure, Defendant
 20 CYNTHIA MARQUEZ and Plaintiff NATIONWIDE INSURANCE COMPANY OF AMERICA, by and
 21 through their attorneys of record, subject to the approval of the Court and good cause present,
 22 hereby stipulate to modify the Pretrial Schedule Order dated January 3, 2017, and extend the
 23 time for discovery deadlines previously set in this matter.

24 The parties submit that there is good cause for the proposed modification of this Court's
 25 Pretrial Scheduling order for the following reasons: The parties have discussed conducting
 26 expert inspections of Ms. Marquez's bicycle and the clothing/helmet she was wearing at the
 27 time of the subject incident and believe these inspections could facilitate early resolution of this
 28 claim short of trial. The parties have exchanged written discovery and conducted depositions

1 of witnesses and emergency personnel, but need additional time in order to coordinate the
2 inspection and conduct any additional follow-up discovery precipitated by the inspection.

3 THEREFORE, THE PARTIES STIPULATE AND AGREE AND RESPECTFULLY REQUEST the
4 following modifications to the scheduling order:

5 The date for completion of discovery is currently scheduled for August 15, 2017. The
6 parties request an extension of this deadline to September 30, 2017.

7 The expert disclosure deadline is currently scheduled for July 3, 2017. The parties
8 request an extension of this deadline to August 15, 2017.

9 The deadline for dispositive motions to be heard is currently scheduled for October 4,
10 2017. The parties request an extension of this deadline to October 25, 2017.

11 All other dates will remain the same as provided for in the January 3, 2017 Civil Minutes
12 and Pretrial Schedule Order.

13 DATED: May 4, 2017

BECHERER KANNETT & SCHWEITZER

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16 By: /s/ David Borovsky
17 DAVID BOROVSKY
Attorney for Plaintiff

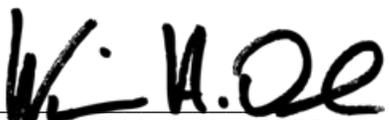
18 DATED: May 4, 2017

DREYER BABICH BUCCOLA WOOD CAMPORA, LLP

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20 By: /s/ Ryan L. Dostart
21 RYAN L. DOSTART
22 Attorney for Defendant

23 **IT IS SO ORDERED:**

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26 DATED: May 9, 2017

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HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE