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8 Attorneys for Plaintiff

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11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 DONALD MANN,

14 Plaintiffs,

15 vs.

16 MUTUAL OF OMAHA;  
17 and DOES 1 through 20, Inclusive,

18 Defendants.

**No. 2:16-CV-02560-WBS-CMK**

**(Honorable William B. Shubb)**

**PARTIES' AMENDED JOINT  
STIPULATION TO CONTINUE CERTAIN  
PRETRIAL AND TRIAL DATES; ORDER  
THEREON**

**Complaint Filed: September 2, 2016**

19 Whereas Plaintiff Donald Mann (“Plaintiff”) and Defendant Mutual of Omaha Insurance  
20 Company (“Mutual of Omaha”) agree that as set forth in the concurrently-filed declaration of  
21 plaintiffs’ trial counsel, John Douglas Barr, Mr. Barr has an unforeseen medical issue precluding  
22 the maintenance of the pre-trial and trial dates in this action, as currently set;


23 Whereas Plaintiff’s co-counsel, Cathleen Theresa Barr, has been practicing for less than  
24 five years and has no experience preparing for and trying a complicated insurance bad faith  
25 action alone, and therefore would need the assistance of a more senior trial attorney well versed  
26 in insurance bad faith litigation both for pre-trial preparation and to act as primary trial counsel,  
27 to ensure plaintiff is not prejudiced;



1 **IT IS HEREBY ORDERED** that Pretrial Scheduling Order of this court should be, and  
2 is hereby, modified as follows:

DEADLINE	CURRENT SCHEDULING ORDER	PROPOSED SCHEDULING ORDER
Expert Disclosure	February 23, 2018	August 27, 2018
Rebuttal Expert Disclosure	March 26, 2018	October 1, 2018
Discovery Cutoff	April 20, 2018	November 2, 2018
Last day to file Motions	May 1, 2018	November 19, 2018
Pretrial Conference	June 18, 2018 at 1:30 p.m.	<b>February 11, 2019 at 1:30 p.m.</b>
Trial	August 14, 2018 at 9:00 a.m.	<b>April 9, 2019 at 9:00 a.m.</b>

20  
21 Dated: February 13, 2018

  
22 **WILLIAM B. SHUBB**  
23 **UNITED STATES DISTRICT JUDGE**