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 12 CSAA INSURANCE EXCHANGE

13  
 14 **UNITED STATES DISTRICT COURT**

15 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

16 CSAA INSURANCE EXCHANGE, as  
 17 subrogee of Pedro Casteneda, Maria  
 DeRodriguez, Tongo Inthilath; Andrew &  
 18 Dena Savage; Audry Ngo,

19 Plaintiff,

20 v.

21 BROAN-NUTONE LLC and DOES 1 through  
 22 50, inclusive,

23 Defendants.

Case No. 2:16-CV-02929-TLN-AC

**PARTIES' STIPULATION AND  
 REQUEST TO CONTINUE PLAINTIFF  
 CSAA INSURANCE EXCHANGE'S  
 MOTION TO COMPEL DEPOSITION OF  
 30(B)(6) DEPONENT**

Date: October 31, 2018

Time: 10:00 a.m.

Courtroom: 26, 8th Floor

Judge: Honorable Allison Claire

Trial: June 3, 2019

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 26 **TO THE HONORABLE COURT**, plaintiff CSAA Insurance Exchange ("Plaintiff"), and

27 Defendant Broan-NuTone LLC ("Defendant") (collectively the "Parties"), by and through their

28 respective counsel of record, hereby stipulate, agree, and request that the Court continue the hearing

1 on Plaintiff’s Motion to Compel Deposition of 30(B)(6) Deponent (ECF No. 42), for which good  
2 cause exists, as follows:

3           **WHEREAS**, on June 21, 2018, Plaintiff filed its motion to compel the deposition of  
4 Defendant’s Person Most Knowledgeable. (ECF No. 28.) Thereafter, the Parties came to an  
5 informal resolution, and Plaintiff withdrew its motion. (ECF No. 30.)

6           **WHEREAS**, since that time, the Parties have been unable to agree when a deponent must  
7 be produced.

8           **WHEREAS**, as a result of this disagreement, on September 26, 2018, Plaintiff renewed its  
9 motion to compel the second deposition of Defendant’s Person Most Knowledgeable. (ECF No.  
10 42.) Plaintiff provided Defendant its final draft Joint-Statement setting forth Plaintiff’s position on  
11 October 16, 2018. Thereafter, counsel for the Parties met and conferred, whereby counsel for  
12 Defendant requested additional time to participate in the drafting of the Joint-Statement. Plaintiff  
13 has agreed.

14           **WHEREAS**, as part of the meet and confer efforts, counsel for Defendant called and  
15 obtained this Court’s availability for continuing the motion. Counsel for defendant was informed  
16 that the hearing date of November 14, 2018 was available.

17           **THEREFORE**, the Parties now agree, and request, that this Court continue the hearing on  
18 Plaintiff’s Motion to Compel the Second Deposition of Defendant’s Person Most Knowledgeable  
19 (ECF No. 42) until November 14, 2018.

20  
21 Dated: October 17, 2018

HAIGHT BROWN & BONESTEEL LLP

22  
23 By: \_\_\_\_\_  
24           /s/ Krsto Mijanovic  
25           Krsto Mijanovic  
26           Steven A. Scordalakis  
27           Attorneys for Defendant  
28           BROAN-NUTONE LLC

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Dated: October 17, 2018

Jang & Associates, LLP


By:         /s/ Sally Noma          
Alan J. Jang  
Sally Noma  
Attorneys for Plaintiff,  
CSAA INSURANCE EXCHANGE

**[PROPOSED] ORDER**

**COME NOW**, the Parties' Stipulation and Request to Continue the Hearing on Plaintiff's Motion to Compel the Deposition of 30(B)(6) Deponent came before the Court. Having found good cause, this Court continues the hearing on the motion (ECF No. 42) until November 14, 2018.

**IT IS SO ORDERED**

Dated: October 18, 2018

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

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