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8 Attorneys for Plaintiffs KAREN RIGSBY,
 9 Trustee, and DONALD P. STEINMEYER

10 UNITED STATES DISTRICT COURT – STATE OF CALIFORNIA

11 EASTERN DISTRICT

12 DONALD P. STEINMEYER, an) Case No. 2:17-cv-01347-MCE-EFB
 13 individual)
 14) **STIPULATION REGARDING**
 15 Plaintiff,) **EXCHANGE OF INITIAL**
 16) **DISCLOSURES AND ORDER**
 17 vs.) **THEREON**

18 INTERCARE SPECIALITY RISK)
 19 INSURANCE SERVICES, INC, a) JURY TRIAL DEMANDED
 20 California Corporation; ISR HOLDINGS,)
 21 INC., a California Corporation; KEVIN)
 22 HAMM, an individual; and PATRIOT)
 NATIONAL, INC., a Florida Corporation.)
 Defendants.)

WHEREAS, on August 30, 2017, pursuant to the Initial Pretrial Scheduling Order of this court dated June 30, 2017 (Doc. 4), counsel for plaintiffs KAREN RIGSBY, Trustee, DONALD P. STEINMEYER (“Plaintiffs”) and counsel for defendant PATRIOT NATIONAL, INC. (“Patriot”) met and conferred as required by Federal Rule of Civil Procedure 26(f) regarding their discovery plan.

Having so met and conferred IT IS HEREBY STIPULATED by the Plaintiffs and Patriot that:

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1. Plaintiffs and Patriot shall make their initial disclosures under Rule 26 within 14 days of the Rule 26(f) conference, or within 14 days of September 30, 2017, whichever date is earlier.

2. Within fourteen (14) days of the initial disclosures by Plaintiffs and Patriot, Patriot and Plaintiffs shall conduct a further conference regarding the discovery plan for this case.

3. Until this further conference, Plaintiffs and Patriot shall not propound to each other any formal discovery.

4. By entering into this Stipulation and requesting an order thereon, the parties do not submit to jurisdiction or venue. The parties reserve all claims and defenses relating to the jurisdiction of this court of the venue of this action or their consent to the same.

IT IS SO STIPULATED.

Dated: August 31, 2017

CONRAD & SCHERER LLP

_____/S/_____
Russell R. O'Brien
Attorneys for Defendant
PATRIOT NATIONAL, INC.

Dated: August 31, 2017

KATZOFF & RIGGS LLP

_____/S/_____
Robert R. Riggs
Stephen G. Preonas
Attorneys for Plaintiffs

IT IS SO ORDERED.

Dated: September 11, 2017



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE