

STEPTOE & JOHNSON LLP
One Market Street, Steuart Tower, Suite 1800
San Francisco, CA 94105

Laurie Edelstein (Bar No. 164466)
Michael E. Flynn-O'Brien (Bar No. 291301)
STEPTOE & JOHNSON LLP
One Market Street
Steuart Tower, Suite 1800
San Francisco, California 94105
Telephone: (415) 365-6700
Facsimile: (415) 365-6699
ledelstein@steptoe.com
sjackel@steptoe.com

Michael Dockterman (admitted *pro hac vice*)
STEPTOE & JOHNSON LLP
115 S. LaSalle Street, Suite 3100
Chicago, Illinois 60603
Telephone: (312) 577-1300
Facsimile: (312) 577-1370
mdockterman@steptoe.com

*Attorneys for Defendant
Pacific Gas and Electric Company*

John Cox (Bar No. 197687)
LAW OFFICES OF JOHN COX
Telephone: (416) 939-6303

Nathan R. Jaskowiak (Bar No. 248007)
Alexander J. Bukac (Bar No. 305491)
KEESAL, YOUNG & LOGAN
450 Pacific Avenue
San Francisco, California 94133
Telephone: (415) 398-6000
Facsimile: (415) 981-0136

Mikal C. Watts (admitted *pro hac vice*)
Francisco Guerra IV (admitted *pro hac vice*)
Mark A. Fassold (admitted *pro hac vice*)
Watts Guerra, L.L.P.
Four Dominion Drive
Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: (210) 527-0500
Facsimile: (210) 527-0501

*Attorneys for Plaintiff
Valero Refining Company – California*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

VALERO REFINING COMPANY –
CALIFORNIA, a Delaware corporation,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY, a
California corporation,

Defendant.

No. 17 Civ. 1350 (TLN) (EFB)

**STIPULATION AND ORDER TO
AMEND DEADLINES IN PRETRIAL
SCHEDULING ORDER**

STIPULATED REQUEST TO AMEND DEADLINES
IN PRETRIAL SCHEDULING ORDER

No. 17 Civ. 1350 (TLN) (EFB)

STIPULATION TO AMEND DEADLINES IN PRETRIAL SCHEDULING ORDER

WHEREAS, to date, the parties have taken 13 depositions and served 133 requests for production, 137 requests for admission, 24 interrogatories, and 12 requests for inspection;

WHEREAS, the parties are in the process of completing the remainder of discovery, including the production of documents, taking of depositions, and inspection of the refinery;

WHEREAS, the scheduling of the remaining discovery has proven challenging, and the parties believe an extension will help complete the remaining discovery in an orderly fashion and minimize, if not eliminate, discovery disputes that might otherwise require the Court's attention;

WHEREAS, the parties have agreed it would be beneficial to the parties and facilitate the completion of discovery to extend the deadline for the close of fact discovery from June 29, 2018 to August 24, 2018; the deadline for disclosure of expert witnesses from August 30, 2018 to October 19, 2018; the deadline for disclosure of rebuttal experts from September 29, 2018 to November 16, 2018; and the deadline for hearing on dispositive motions from December 6, 2018 to February 7, 2019;

WHEREAS, the only prior request for an extension of deadlines set forth in the Pretrial Scheduling Order was a joint request for a 10-day extension to rebuttal expert reports filed by the parties two weeks after the Pretrial Scheduling Order was entered (*see* Dkt. #28);

WHEREAS, the extensions agreed to by the parties, subject to approval by the Court, will not change the deadlines for submission of the joint pretrial conference statement, the final pretrial conference, or the trial date;

IT IS HEREBY STIPULATED AND AGREED by and between the plaintiff Valero Refining Company – California and defendant Pacific Gas and Electric Company, through their undersigned counsel and subject to the approval of the Court, that the following deadlines set forth in the Pretrial Scheduling Order (Dkt. #26, as amended by Dkt. #28) shall be amended as follows:

Event	Current Deadline	New Deadline
Close of Fact Discovery	June 29, 2018	August 24, 2018
Expert Disclosures and Reports	August 30, 2018	October 19, 2018
Rebuttal Expert Disclosures and Reports	September 29, 2018	November 16, 2018
Deadline for Hearing on Dispositive Motions	December 6, 2018	February 7, 2019* * Subject to the Court's availability and convenience.
Joint Pretrial Conference Statement	March 28, 2019	Unchanged
Final Pretrial Conference	April 4, 2019	Unchanged
Trial	June 3, 2019	Unchanged

All other dates set forth in the Pretrial Scheduling Order, as amended, shall remain unchanged.

Dated: June 12, 2018

Respectfully submitted,

KEESAL, YOUNG & LOGAN

By: /s/ John Cox

John Cox (Bar No. 197687)
LAW OFFICES OF JOHN COX
Telephone: (416) 939-6303

Nathan R. Jaskowiak
Alexander J. Bukac
KEESAL, YOUNG & LOGAN
450 Pacific Avenue
San Francisco, California 94133
Telephone: (415) 398-6000

Mikal C. Watts (admitted *pro hac vice*)
Francisco Guerra IV (admitted *pro hac vice*)
Mark A. Fassold (admitted *pro hac vice*)
Watts Guerra, L.L.P.
Four Dominion Drive
Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: (210) 527-0500
Facsimile: (210) 527-0501

*Attorneys for Plaintiff Valero Refining
Company – California*

Dated: June 12, 2018

STEPTOE & JOHNSON LLP

By: /s/ Michael E. Flynn-O'Brien

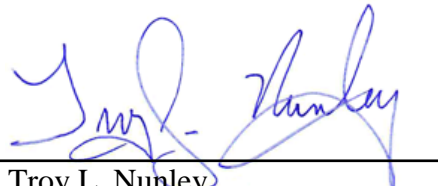
Laurie Edelstein
Michael E. Flynn-O'Brien
STEPTOE & JOHNSON LLP
One Market Street
Steuart Tower, Suite 1800
San Francisco, California 94105
Telephone: (415) 365-6700

Michael Dockterman
STEPTOE & JOHNSON LLP
115 S. LaSalle Street, Suite 3100
Chicago, Illinois 60603
Telephone: (312) 577-1300

*Attorneys for Defendant Pacific Gas and
Electric Company*

IT IS SO ORDERED.

Dated: June 14, 2018



Troy L. Nunley
United States District Judge