

1 CHARLES S. PAINTER (SBN 89045)
 2 REBECCA L. MENENDEZ (SBN 262487)
ERICKSEN ARBUTHNOT
 100 Howe Avenue, Suite 110 South
 3 Sacramento, CA 95825-8201
 (916) 483-5181 Telephone
 4 (916) 483-7558 Facsimile

5 Attorneys for Defendant/Third Party Plaintiff,
 6 PAPÉ TRUCKS, INC.

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9

10 ROGER DRIVER,
 11 Plaintiff,

12 vs.

13 PAPÉ TRUCKS, INC. AN OREGON
 14 CORPORATION,
 15 Defendant.

16 AND RELATED CROSS-ACTIONS
 17

) Case No.: 2:17-CV-01968- KJN

) **STIPULATION AND ~~PROPOSED~~**
ORDER TO EXTEND DEADLINES

18 WHEREAS the court previously ordered the deadlines listed below, pursuant to a prior
 19 stipulation between the parties; whereas the parties, through their respective counsel, have
 20 recently met and conferred; whereas the parties have been working diligently to complete the
 21 needed discovery of witnesses located all over the country; whereas COVID-19 has delayed the
 22 completion of discovery; whereas the parties have full trial calendars due to the bottleneck of
 23 trials that COVID-19 has created; whereas based on the foregoing, the parties have agreed and
 24 stipulated to continue the following deadlines:

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	Event	Current Date	New Date
1.	Fact Discovery Cut-Off	April 14, 2022	May 31, 2022
2.	Deadline for Initial Designation of Expert Witnesses	February 14, 2022	August 31, 2022
3.	Deadline for Designation of Rebuttal Expert Witnesses	March 14, 2022	September 30, 2022
4.	Expert Discovery Cut-Off	April 14, 2022	November 15, 2022
5.	Dispositive Motion Hearing Cut-Off	June 7, 2022	January 17, 2023
6.	Final Pre-Trial Conference	Not set	Not set
7.	Jury Trial	Not Set	Not set

IT IS SO STIPULATED:

DATED: March 11, 2022

ERICKSEN ARBUTHNOT

By

CHARLES S. PAINTER
REBECCA L. MENENDEZ
Attorneys for Defendant/Third Party Plaintiff
PAPÉ TRUCKS, INC.

DATED: March 11, 2022

CUTTER LAW P.C.

By

*/s/Celine E. Cutter as
Authorized on 3/11/22*
C. BROOKS CUTTER
CELINE CUTTER
Attorneys for Plaintiff ROGER DRIVER

DATED: March 11, 2022

WOOD SMITH HENNING & BERMAN,
LLP

By

*/s/ Matthew A. Williams as
Authorized on 3/11/22*
MATTHEW A. WILLIAMS
Attorneys for Third-Party Defendant
JOMAR INVESTMENTS, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


DATED: March 11, 2022

GIBSON ROBB & LINDH LLP

By /s/R. Hudson Hollister as
Authorized on 3/11/22
JOSHUA E. KIRSCH
R. HUDSON HOLLISTER
Attorneys for Plaintiff In Intervention
ACCIDENT FUND INSURANCE
COMPANY OF AMERICA

IT IS SO ORDERED.

Dated: March 15, 2022


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE