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

7 UNITED STATES DISTRICT COURT  
 8 EASTERN DISTRICT OF CALIFORNIA

10 ROGER DRIVER,  
 11 Plaintiff,  
 12 vs.  
 13 PAPÉ TRUCKS, INC. AN OREGON  
 14 CORPORATION,  
 15 Defendant.

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16 AND RELATED CROSS-ACTIONS

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 a witness for Jomar has recently had COVID  
 24 preventing the scheduling of their deposition; whereas the only date being amended herein is the  
 25 close of fact discovery; whereas based on the foregoing, the parties have agreed and stipulated to  
 26 continue the following deadlines:

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	<b>Event</b>	<b>Current Date</b>	<b>New Date</b>
1.	Fact Discovery Cut-Off	August 31, 2022	October 31, 2022
2.	Deadline for Initial Designation of Expert Witnesses	November 30, 2022	(same)
3.	Deadline for Designation of Rebuttal Expert Witnesses	December 30, 2022	(same)
4.	Expert Discovery Cut-Off	February 15, 2023	(same)
5.	Dispositive Motion Hearing Cut-Off	April 17, 2023	(same)
6.	Final Pre-Trial Conference	Not set	Not set
7.	Jury Trial	Not set	Not set

**IT IS SO STIPULATED:**

DATED: August 30, 2022

ERICKSEN ARBUTHNOT

By

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

DATED: August 30, 2022

CUTTER LAW P.C.

By

*/s/Celine E. Cutter as  
 authorized on 8/30/22*  
 \_\_\_\_\_  
 C. BROOKS CUTTER  
 CELINE CUTTER  
 Attorneys for Plaintiff  
 ROGER DRIVER

DATED: August 30, 2022

WOOD SMITH HENNING & BERMAN,  
 LLP

By

*/s/ Matthew A. Williams as  
 authorized on 8/30/22*  
 \_\_\_\_\_  
 MATTHEW A. WILLIAMS  
 Attorneys for Third-Party Defendant  
 JOMAR INVESTMENTS, INC.

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DATED: August 30, 2022

GIBSON ROBB & LINDH LLP

By /s/ R. Hudson Hollister as  
authorized on 8/30/22  
JOSHUA E. KIRSCH  
R. HUDSON HOLLISTER  
Attorneys for Plaintiff In Intervention  
ACCIDENT FUND INSURANCE  
COMPANY OF AMERICA

**IT IS SO ORDERED.**

Dated: September 1, 2022

Kendall J. Newman  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE