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13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 STORZ MANAGEMENT COMPANY, a
California Corporation, and STORZ
16 REALTY, INC.,

17 Plaintiffs,

18 vs.

19 ANDREW CAREY, an individual, and
20 MARK WEINER, an individual,

21 Defendants.

22 And related cross-claim.

No. 2:18-cv-00068 TLN DB

**STIPULATION AND ORDER RE:
MODIFICATION OF ORDER DATED
MARCH 12, 2020 (DCKT. NO. 130)**

23
24 Plaintiffs/Counterdefendants Storz Management Company and Storz Realty, Inc.
25 (“Plaintiffs”), together with Defendants/Counterclaimants Andrew Carey and Mark Weiner
26 (“Defendants”) (Plaintiffs and Defendants referred to collectively as the “Parties”) hereby stipulate
27 to and request a modification to the Court’s March 12, 2020 Order as follows:

28 WHEREAS, on or about February 14, 2020, the Court issued an Order (Dckt. # 125)



1 granting Defendants’ Motion to Compel Continued Deposition of James Pierini as Storz
2 Management Company’s (“SMC”) Person Most Knowledgeable (Dckt. # 116) and ordering
3 Plaintiffs to produce witness James Pierini for a continued deposition as SMC’s PMK by no later
4 than March 13, 2010; and

5 WHEREAS, on or about March 12, 2020, the Court issued an Order (Dckt. # 130)
6 modifying its February 14 Order to allow until April 17 for the Parties to complete the deposition
7 of Mr. Pierini, given the scheduling difficulties created by current public health concerns; and

8 WHEREAS, due to continued social distancing, travel, and other restrictions necessitated
9 by the current public health environment, the Parties agree that the deposition needs to be
10 continued to a later date; and

11 WHEREAS, the Parties jointly request that the Court modify its March 12, 2020 Order
12 (Dckt. # 130) to allow additional time for the continued deposition of Mr. Pierini as SMC’s PMK
13 to take place.

14 NOW, THEREFORE, the Parties jointly request:

- 15 1. That the Court modify its March 12, 2020 Order (ECF Document No. 130) to allow
16 Plaintiffs until June 17, 2020 to produce Mr. Pierini for his continued deposition as
17 SMC’s PMK.

18 **IT IS SO STIPULATED AND AGREED.**

19 Respectfully submitted,

20 DATED: April 17, 2020

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By: /s/ Christopher J. Bakes
Christopher J. Bakes
Attorneys for Plaintiffs/Counterdefendants
STORZ MANAGEMENT COMPANY, a
California corporation, and STORZ REALTY,
INC.

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DATED: April 17, 2020

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By: /s/ James Kachmar (as authorized on 4/17/2020)
James Kachmar
Attorneys for Defendants / Counterclaimants
ANDREW CAREY and MARK WEINER

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

DATED: April 20, 2020

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

