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AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC. and
7 IDS PROPERTY CASUALTY INSURANCE COMPANY

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11 PLAINTIFF IN PRO PER

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13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA
15

16 KAMLESH BANGA,
17 Plaintiff,
18 vs.
19 AMERIPRISE AUTO & HOME INSURANCE
AGENCY AND DOES 1 through 10 inclusive
20 Defendant.
21

Case No. 2:18-cv-01072-MCE-AC

**STIPULATION TO EXTEND
DEADLINES FOR DEPOSITIONS
AND DISPOSITIVE MOTIONS;
[PROPOSED] ORDER**

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STIPULATION TO EXTEND DEADLINES FOR DEPOSITIONS AND DISPOSITIVE
MOTIONS; [PROPOSED] ORDER

1 Plaintiff Kamlesh Banga, in pro per (“Banga”), and Defendants Ameriprise Auto & Home
2 Insurance Agency, Inc. and IDS Property Casualty Insurance Company (“IDS”) (collectively
3 “Defendants”), by and through their attorneys of record, hereby stipulate as follows:

4 WHEREAS, on December 17, 2020, the Court issued an order that extended the discovery
5 deadline to March 3, 2021, and the deadline for dispositive motions to April 7, 2021. (ECF No.
6 91.) No trial date has been set for this action.

7 WHEREAS, IDS’ witnesses¹ are directly involved in handling extensive claims resulting
8 from the catastrophic freeze and power shut off events that recently occurred in Texas. It would
9 be overly burdensome on the witnesses to prepare and sit for deposition within the next few weeks,
10 while they are working to compensate victims.

11 WHEREAS, the parties have met and conferred, and agree that Banga should be permitted
12 to take the Rule 30(b)(6) depositions of Defendants after the close of discovery. The parties agree
13 that Banga should have until May 3, 2021 to complete the Rule 30(b)(6) depositions of Defendants,
14 and the deadline for hearings on dispositive motions should be continued to June 9, 2021.

15 WHEREAS, the parties are not requesting a continuance of any other deadlines, including
16 the deadline to complete discovery other than the Rule 30(b)(6) depositions of Defendants.

17 WHEREAS, this is the parties’ second stipulation for a continuance of deadlines.

18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

19 Banga should have until May 3, 2021 to complete the Rule 30(b)(6) depositions of
20 Defendants and the deadline for hearings on dispositive motions should be continued to June 9,
21 2021.

22 SO STIPULATED.

23 Dated: February 23, 2021

24 By /s/ Kamlesh Banga (as authorized on 2.23.21)
25 Kamlesh Banga
26 PLAINTIFF IN PRO PER

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28 ¹ One of IDS’ Rule 30(b)(6) witnesses has also been designated as the Rule 30(b)(6) witness on behalf of Agency.

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Dated: February 23, 2021

GORDON REES SCULLY MANSUKHANI, LLP

By /s/ Jennifer N. Wahlgren
Jordan S. Altura
Jennifer N. Wahlgren
Attorneys for Defendants
AMERIPRISE AUTO & HOME INSURANCE
AGENCY, INC. and IDS PROPERTY
CASUALTY INSURANCE COMPANY

PROPOSED ORDER

The Court, having reviewed the stipulation, hereby finds good cause to modify the Status Order in this action as follows: Banga shall have until May 3, 2021 to conduct the Rule 30(b)(6) depositions of Defendants and the deadline for hearings on dispositive motions shall be continued to June 9, 2021.

IT IS SO ORDERED.

Dated: February 24, 2021


Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE