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6 Attorneys for Defendants
 AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC. and
 7 IDS PROPERTY CASUALTY INSURANCE COMPANY

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11 PLAINTIFF IN PRO PER

12
 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
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21 Defendant.
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Case No. 2:18-cv-01072-MCE-AC

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

Gordon Rees Scully Mansukhani, LLP
 275 Battery Street, Suite 2000
 San Francisco, CA 94111

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 February 24, 2021 pursuant to the parties’ stipulation, the Court issued an
5 order extending until May 3, 2021, the deadline for Banga to take the Rule 30(b)(6) depositions of
6 Defendants. (“Order”; ECF No. 119.) The Court also continued the deadline for hearings on
7 dispositive motions to June 9, 2021.

8 WHEREAS, following entry of the Order, counsel for Defendants unexpectedly needed to
9 go on medical leave. Counsel anticipates returning to work within the next 30-45 days.

10 WHEREAS, the parties have met and conferred, and agree that due to counsel’s medical
11 leave, it is necessary to continue the deposition and dispositive motion deadlines. The parties
12 therefore agree that, with the Court’s approval, Banga should have until June 17, 2021 to complete
13 the Rule 30(b)(6) depositions of Defendants, and the deadline for hearings on dispositive motions
14 should be continued to August 4, 2021.

15 WHEREAS, the parties are not requesting a continuance of any other deadlines.

16 WHEREAS, this is the parties’ third stipulation for a continuance of deadlines.

17 THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

18 Banga should have until June 17, 2021 to complete the Rule 30(b)(6) depositions of
19 Defendants and the deadline for hearings on dispositive motions should be continued to August 4,
20 2021.

21 SO STIPULATED.

22 Dated: April 15, 2021

By /s/ Kamlesh Banga (as authorized on 4/15/21)
Kamlesh Banga
PLAINTIFF IN PRO PER

24 Dated: April 15, 2021

GORDON REES SCULLY MANSUKHANI, LLP
By /s/ Jordan S. Altura

Jordan S. Altura
Jennifer N. Wahlgren
Attorneys for Defendants
AMERIPRISE AUTO & HOME INSURANCE
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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 June 17, 2021 to conduct the Rule 30(b)(6) depositions of Defendants and the deadline for hearings on dispositive motions shall be continued to August 4, 2021.

IT IS SO ORDERED.

Dated: April 19, 2021



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE