

1 STEPHEN M. HAYES (SBN 83583)  
 2 STEPHEN P. ELLINGSON (SBN 136505)  
 3 JAMIE A. RADACK (SBN 221000)  
 HAYES SCOTT BONINO ELLINGSON  
 4 GUSLANI SIMONSON & CLAUSE LLP  
 999 Skyway Road, Suite 310  
 5 San Carlos, CA 94070  
 Telephone: 650.637.9100  
 Facsimile: 650.637.8071

6 Attorneys for Defendant  
 STATE FARM MUTUAL AUTOMOBILE  
 7 INSURANCE COMPANY

8 RACHEL RENNO (SBN 272558)  
 FOOS GAVIN LAW FIRM, P.C.  
 9 3947 Lennane Drive, Suite 120  
 Sacramento, CA 95834  
 10 Telephone: 916.779.3500  
 Facsimile: 916.779.3508

11 Attorneys for Plaintiff  
 12 RAVEN DUNCAN

13 UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA

15 RAVEN DUNCAN, an individual,  
 16 Plaintiff,

17 vs.

18 STATE FARM MUTUAL  
 19 AUTOMOBILE INSURANCE  
 COMPANY, a corporation; and DOES 1  
 20 through 25, inclusive,  
 21 Defendants.

CASE NO. 2:18-cv-01174-KJM-AC

**STIPULATION AND ORDER TO  
 PARTIALLY REVISE THE COURT'S  
 OCTOBER 10, 2018 PRETRIAL  
 SCHEDULING ORDER AND DEADLINE TO  
 COMPLETE VDRP**

22  
 23 Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, plaintiff Raven Duncan and  
 24 State Farm Mutual Automobile Insurance Company ("State Farm,") by and through their respective  
 25 counsel, hereby stipulate to partially revise the Court's October 10, 2018 Pretrial Scheduling Order  
 26 and the deadline to complete VDRP as follows:  
 27  
 28

**I.  
RECITALS**

1  
2  
3 1. Pursuant to the Court’s October 10, 2018 Pretrial Scheduling Order, State Farm and  
4 plaintiff began engaging in thorough meet and confer discussions regarding State Farm’s motion for  
5 summary judgment, or in the alternative, partial summary judgment (“Motion”) on September 25,  
6 2019.

7 2. During the meet and confer process related to the Motion, counsel raised issues that  
8 require further investigation by the parties.

9 3. Also during the meet and confer process related to the Motion, the parties engaged in  
10 discussions regarding the potential for settlement.

11 4. For the purpose of potentially narrowing the issues to be presented in State Farm’s  
12 Motion, and to further explore the potential for settlement, the parties agreed to request leave of the  
13 Court to continue the Pretrial Scheduling Order and deadline to complete VDRP for 90 days.

14 5. Accordingly, the parties hereby stipulate to partially revising the Court’s Pretrial  
15 Scheduling Order and deadline to complete VDRP as follows:

**II.  
STIPULATION**

16  
17 The parties hereby stipulate, and request approval of the following revisions to the Court’s  
18 Pretrial Scheduling Order and deadline to complete VDRP:

<b>Event</b>	<b>Current Deadline</b>	<b>Requested New Deadline</b>
Dispositive Motion Hearing	November 15, 2019	February 14, 2019
Complete VDRP	December 6, 2019	March 6, 2020
Discovery Cut-Off	January 17, 2020	April 17, 2020
Expert Disclosures	February 17, 2020	May 15, 2020
Expert Reports	March 2, 2020	June 2, 2020
Expert Discovery Cut-Off	April 2, 2020	July 2, 2020

1 Dated: September 30, 2019

FOOS GAVIN LAW FIRM, P.C.

2

3

By /S/ Rachel Renno  
RACHEL RENNO  
Attorneys for Plaintiff  
RAVEN DUNCAN

4

5

6 Dated: September 30, 2019

HAYES SCOTT BONINO ELLINGSON GUSLANI  
SIMONSON & CLAUSE LLP

7

8

By /S/ Jamie A. Radack  
STEPHEN M. HAYES  
STEPHEN P. ELLINGSON  
JAMIE A. RADACK  
Attorneys for Defendant  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

9

10

11

12

**ORDER**

13

14

15

16

The Court, having reviewed the parties' Stipulation to Partially Revise the Court's Pretrial Scheduling Order and deadline to complete VDRP, hereby **GRANTS** the parties' request. The new deadlines are as follows:

17

18

19

20

21

22

23

24

<b>Event</b>	<b>Previous Deadline</b>	<b>New Deadline</b>
Dispositive Motion Hearing	November 15, 2019	February 7, 2020
Complete VDRP	December 6, 2019	March 6, 2020
Discovery Cut-Off	January 17, 2020	April 17, 2020
Expert Disclosures	February 17, 2020	May 15, 2020
Expert Reports	March 2, 2020	June 2, 2020
Expert Discovery Cut-Off	April 2, 2020	July 2, 2020

**IT IS SO ORDERED.**

25

Dated: September 27, 2019.

26

27

28

  
UNITED STATES DISTRICT JUDGE