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22 UNITED STATES DISTRICT COURT
 23 EASTERN DISTRICT OF CALIFORNIA

24 RAVEN DUNCAN, an individual,

25 Plaintiff,

26 vs.

27 STATE FARM MUTUAL
 28 AUTOMOBILE INSURANCE
 COMPANY, a corporation; and DOES 1
 through 25, inclusive,

Defendants.

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

**STIPULATION AND ORDER TO
 PARTIALLY REVISE THE COURT'S
 NOVEMBER 15, 2019 STIPULATED
 SCHEDULING ORDER AND DEADLINE TO
 COMPLETE VDRP**

29 Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, plaintiff Raven Duncan and
 30 State Farm Mutual Automobile Insurance Company ("State Farm,") by and through their respective
 31 counsel, hereby stipulate to partially revise the Court's November 15, 2019 Stipulated Scheduling
 32 Order and the deadline to complete VDRP as follows:

**I.
RECITALS**

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3 1. On March 16, 2020, seven Bay Area counties – Alameda, Contra Costa, Marin,
4 Santa Clara, San Francisco, San Mateo, and Santa Cruz issued a “Shelter-In-Place” mandate in an
5 attempt to slow the spread of the COVID-19 disease. Three days later, California Governor Gavin
6 Newsom issued a “Shelter-In-Place” order for an unknown period.

7 2. Since the November 15, 2019 Stipulated Scheduling Order, the parties have chosen
8 neutral Joseph Ferraro to conduct the VDRP conference. The parties prefer to have the VDRP
9 conference in-person. The parties have not been able to conduct the VDRP conference due to the
10 “Shelter-In-Place” Orders.

11 3. The hearing on State Farm’s motion for summary judgment went forward on May
12 15, 2020. This Court took the motion under submission. This Court has not ruled on State Farm’s
13 motion for summary judgment.

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

**II.
STIPULATION**

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

Event	Current Deadline	Requested New Deadline
Complete VDRP	October 5, 2020	November 4, 2020
Discovery Cut-Off	December 30, 2020	January 29, 2021
Expert Disclosures	January 29, 2021	March 1, 2021
Expert Reports	February 18, 2021	March 19, 2021
Expert Discovery Cut-Off	March 18, 2021	April 16, 2021

1 Dated: September 21, 2020

FOOS GAVIN LAW FIRM, P.C.

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3 By /S/ Rachel Renno
4 RACHEL RENNO
5 Attorneys for Plaintiff
6 RAVEN DUNCAN

7 Dated: September 21, 2020

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15 STATE FARM MUTUAL AUTOMOBILE
16 INSURANCE COMPANY

17 **ORDER**

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

21 Event	22 Previous Deadline	23 New Deadline
24 Complete VDRP	October 5, 2020	November 4, 2020
25 Discovery Cut-Off	December 30, 2020	January 29, 2021
26 Expert Disclosures	January 29, 2021	March 1, 2021
27 Expert Reports	February 18, 2021	March 19, 2021
28 Expert Discovery Cut-Off	March 18, 2021	April 16, 2021

IT IS SO ORDERED.

29 Dated: September 22, 2020

30 
31 CHIEF UNITED STATES DISTRICT JUDGE