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11 Attorneys for Defendants  
12 AMCO INSURANCE COMPANY aka  
13 NATIONWIDE INSURANCE COMPANY

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17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF CALIFORNIA  
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20 MARWAN JARADAH, an individual,  
21 ZIAD MUBARAKA, an individual, ASEF  
KASSIH, an individual,

22 Plaintiffs,

23 vs.

24 AMCO INSURANCE COMPANY aka  
25 NATIONWIDE INSURANCE  
COMPANY, an Ohio Corporation doing  
business in California; and DOES 1 to 30,  
inclusive,

26 Defendants.

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28 Case No. 2:21-CV-02179-MCE-DMC

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINE 90  
DAYS**

1 Plaintiffs Marwan Jaradah, Ziad Mubaraka, Asef Kassih and defendant AMCO Insurance  
2 Company aka Nationwide Insurance Company, by and through their respective counsel of  
3 record, stipulate and agree as follows and respectfully request entry of an order giving effect to  
4 their stipulation:

5 WHEREAS, AMCO filed a Notice of Removal on November 23, 2021 (*see* ECF Dkt.  
6 No. 1);

7 WHEREAS, pursuant to the Initial Pretrial Scheduling Order, all discovery, with the  
8 exception of expert discovery, shall be completed no later than 365 days from the date upon  
9 which the last answer may be filed, or from the date of removal, whichever is later (*see* ECF Dkt.  
10 No. 3);

11 WHEREAS, the parties have engaged in written discovery during this period, but, due to  
12 scheduling conflicts, and unavailability of witnesses, and parties being out of the country for a  
13 majority of the summer, have been unable to schedule the requisite depositions;

14 WHEREAS, the Court has not previously modified any deadlines in this case;

15 WHEREAS, a continuance of the discovery deadline and, as a result, other case deadlines  
16 is necessary to provide the parties with adequate time to explore potential case resolution and to  
17 avoid unproductive proceedings and unnecessary litigation costs;

18 WHEREAS, the parties agree that the interests of judicial economy, efficiency and  
19 convenience of the Court and the parties would be furthered by continuing the dates in the Initial  
20 Pretrial Scheduling Order (ECF Dkt. No. 3) by 90 days, as follows:

	<b>Original Deadline</b>	<b>Proposed Deadline (Adding 90 Days)</b>
<b>Non-Expert Discovery Cut-Off</b>	November 23, 2022	February 23, 2023
<b>Designation of Expert Witnesses</b>	January 23, 2023	April 24, 2023

<b>Designation of Rebuttal Experts</b>	February 22, 2023	May 24, 2023
<b>Discovery Motion Filing Cut-Off</b>	May 22, 2023	August 22, 2023
<b>Joint Notice of Trial Readiness</b>	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

WHEREAS, the parties agree that all other case deadlines, including trial and motion deadlines, and dates imposed by order, local rules, or otherwise, shall be reset in accordance with the 90 day continuance requested;

NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

The deadlines in this matter, set forth in the Initial Pretrial Scheduling Order and all other case deadlines be continued by 90 days as set forth in part in the table above, or as soon thereafter as the Court's calendar allows. Alternatively, the parties respectfully request that the Court set a further case management conference at which new dates may be selected.

The parties respectfully request the Court to adopt the foregoing stipulation as the order of the Court.

**IT IS SO STIPULATED.**

Dated: September 9, 2022

PETERS, HABIB, McKENNA, JUHL-RHODES & CARDOZA, LLP

By: /s/ Lia Michelle Juhl-Rhodes  
LIA MICHELLE JUHL-RHODES

Attorney for Plaintiffs  
MARWAN JARADAH, ZIAD MUBARAKA,  
and ASEF KASSIH

1 Dated: September 9, 2022

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3 DENTONS US LLP

4 By: /s/ Emily Nozick  
5 SONIA MARTIN  
6 EMILY NOZICK

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## **ORDER**

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth in the Court's Initial Pretrial Scheduling Order and all other case deadlines by 90 days, in part, as follows:

<b>Non-Expert Discovery Cut-Off</b>	February 23, 2023
<b>Designation of Expert Witnesses</b>	April 24, 2023
<b>Designation of Rebuttal Experts</b>	May 24, 2023
<b>Discovery Motion Hearing Cut-Off</b>	August 22, 2023
<b>Joint Notice of Trial Readiness</b>	30 Days After Ruling on Dispositive Motions

IT IS SO ORDERED.

Dated: September 15, 2022

  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE