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AMCO INSURANCE COMPANY aka
NATIONWIDE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MARWAN JARADAH, an individual,
ZIAD MUBARAKA, an individual, ASEF
KASSIH, an individual,

Plaintiffs,

vs.

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

Defendants.

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

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

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

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

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

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

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

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

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

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

Designation of Rebuttal Experts	February 22, 2023	May 24, 2023
Discovery Motion Filing Cut-Off	May 22, 2023	August 22, 2023
Joint Notice of Trial Readiness	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

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Dated: September 9, 2022

DENTONS US LLP

By: /s/ Emily Nozick

SONIA MARTIN
EMILY NOZICK

Attorneys for Defendants
AMCO INSURANCE COMPANY, aka
NATIONWIDE INSURANCE COMPANY


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:

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

IT IS SO ORDERED.

Dated: September 15, 2022



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