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12 Attorneys for Defendants
 ABD INSURANCE AND FINANCIAL SERVICES, INC. dba
 13 NEWFRONT; and KEITH BROWN

14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA
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17 KEENAN & ASSOCIATES,
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 Plaintiff,
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 v.
 20 ABD INSURANCE AND FINANCIAL
 SERVICES, INC. dba NEWFRONT, a
 21 Delaware corporation; KEITH BROWN, an
 22 individual,
 23 Defendant.
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Case No: 2:22-cv-00669-KJM-KJN

JOINT STIPULATION FOR

**(1) EXTENSION RE: STIPULATED
 TEMPORARY RESTRAINING
 ORDER;**

**(2) EXTENSION TO THE AUGUST 25,
 2022 STATUS (PRETRIAL
 SCHEDULING) CONFERENCE;**

AND [PROPOSED] ORDER

1 incomplete, with the Parties diligently working on what is left in the forensic discovery. At this time, the
2 Parties are also discussing potential limited discovery to supplement the parties' forensic protocol
3 agreement, with the contemplated discovery to be completed by the end of August 2022, at which time
4 the Parties will be prepared to submit a Joint Report on whether Plaintiff will be requesting a briefing
5 schedule for a preliminary injunction motion. The Parties therefore stipulate to a one-month extension,
6 until August 29, 2022 ("Stipulated Extension Date") to the Joint Report Deadline; and

7 WHEREAS, there is currently an August 25, 2022 Status (Pretrial Scheduling) Conference
8 ("Status Conference") for the Parties. [Dkt. #4]. As a result of the timing of the upcoming status
9 conference, the Parties' Rule 26(f) scheduling conference, initial disclosures and a discovery plan will
10 be due in August and prior to the date by which the parties jointly anticipate completion of the forensic
11 discovery. As noted above, it is this forensic discovery (and additional discovery being discussed) that
12 will determine whether Plaintiff will pursue a preliminary injunction. As a result, the parties agree that
13 it would best serve the interests of efficiency and judicial economy for the Court to reschedule the Status
14 (Pretrial Scheduling) Conference – and all associated Rule 26 dates – to a date following the Joint Report
15 Deadline. Because the Parties hereby stipulate that the Joint Report Deadline be continued until August
16 29, the Parties request the Court continue the Status (Pretrial Scheduling) Conference to a date in October
17 or thereafter, at the Court's convenience.

18 NOW THEREFORE, the Parties stipulate and agree to the following terms as forth herein and
19 request that the Court enter an Order reflecting those terms:

20 1. The deadline of July 25, 2022 set forth in paragraph 1 of the Order re Stipulated Extension
21 [Dkt. #23], is hereby continued until August 29, 2022. As such, and unless the Parties stipulate to another
22 extension of this deadline, by no later than August 29, 2022, the Parties shall file a joint status report
23 informing the Court whether a preliminary injunction hearing should be scheduled. If the Parties inform
24 the Court that Plaintiff will proceed with its motion for preliminary injunction, then the Parties shall in
25 the joint status report submit a proposed briefing schedule and a proposed hearing date with two
26 alternative dates the Parties and counsel are available.

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1 2. The August 25, 2022 Status (Pretrial Scheduling) Conference [Dkt. #4], and associated
2 FRCP Rule 26 dates, is hereby continued until **October 6, 2022 at 2:30 p.m.** or at a later date at the
3 court's convenience.

4 3. Except as set forth above, all terms of the Stipulated TRO shall remain in full force and
5 effect.

6 **SO STIPULATED.**

7 Dated: July 25, 2022

FISHER & PHILLIPS LLP

8 By: /s/ Andrew Saxon

9 Usama Kahf
10 Andrew E. Saxon
11 Attorneys for Plaintiff
12 KEENAN & ASSOCIATES

12 Dated: July 25, 2022

MOORE RUDELL LLP

13 By: /s/ Howard D. Ruddell
14 (as authorized on 7/25/22)

15 Howard D. Ruddell
16 Attorney for Defendants
17 ABD INSURANCE AND FINANCIAL
18 SERVICES, INC. dba NEWFRONT; KEITH
19 BROWN

18 **IT IS SO ORDERED that:**

19 1. The deadline of July 25, 2022 set forth in paragraph 1 of the Order re Stipulated Extension
20 [Dkt. #23], is hereby continued until August 29, 2022. As such, and unless the Parties stipulate to another
21 extension of this deadline, by no later than August 29, 2022, the Parties shall file a joint status report
22 informing the Court whether a preliminary injunction hearing should be scheduled. If the Parties inform
23 the Court that Plaintiff will proceed with its motion for preliminary injunction, then the Parties shall in
24 the joint status report submit a proposed briefing schedule and a proposed hearing date with two
25 alternative dates the Parties and counsel are available.

26 2. The August 25, 2022 Status (Pretrial Scheduling) Conference [Dkt. #4], and associated
27 FRCP Rule 26 dates, is hereby continued until October 6, 2022 at 2:30 p.m.

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3. Except as set forth above, all terms of the Stipulated TRO shall remain in full force and effect.

DATED: August 2, 2022.



CHIEF UNITED STATES DISTRICT JUDGE

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1 **CERTIFICATE OF SERVICE**

2 I am employed in the County of San Francisco, State of California in the office of a member of
3 the bar of this Court whose direction the following service was made. I am over the age of 18 and I am
4 not a party to this action. My business address 1 Montgomery Street, Suite 3400, San Francisco, CA
5 94104.

6 On the date set forth below, I served the foregoing document entitled **JOINT STIPULATION
7 FOR (1) EXTENSION RE: STIPULATED TEMPORARY RESTRAINING ORDER; (2)
8 EXTENSION TO THE AUGUST 25, 2022 STATUS CONFERENCE; [PROPOSED] ORDER** on
9 all the appearing and/or interested parties in this action as follows:

7 Howard D. Ruddell, Esq,
8 MOORE RUDDELL LLP
9 21250 Hawthorne Blvd., Suite 500
10 Torrance, CA 90503

Attorneys for Defendant
ABD INSURANCE AND FINANCIAL
SERVICES, INC. dba NEWFRONT; and
KEITH BROWN

11 Telephone: (310) 792-7010
12 Fax: (310) 530-1113
13 E-Mail: hruddell@mooreruddell.com

14 [by **ELECTRONIC SUBMISSION**] - I served the above listed document(s) described via the
15 United States District Court’s Electronic Filing Program on the designated recipients via
16 electronic transmission through the CM/ECF system on the Court’s website. The Court’s
17 CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned
18 judge, and any registered users in the case. The NEF will constitute service of the document(s).
19 Registration as a CM/ECF user constitutes consent to electronic service through the court’s
20 transmission facilities.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
22 and correct. Executed on August 2, 2022 at San Francisco, California.

23 _____
24 Jessica Ortiz
25 Print Name

26 By: _____
27 /s/ Jessica Ortiz
28 Signature