

THE AGUILERA LAW GROUP, APLC

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Attorneys for Plaintiff ST. PAUL FIRE AND MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

ST. PAUL FIRE AND MARINE INSURANCE
COMPANY, a Minnesota corporation

Plaintiff,

vs.

CHARTIS SPECIALTY INSURANCE
COMPANY fka AMERICAN
INTERNATIONAL SPECIALTY LINES
INSURANCE COMPANY, an Illinois
corporation; et al.,

Defendants.

Case No. 3:12-cv-04266-JST
Hon. Jon S. Tigar
Mag. Laurel Beeler

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND FACT
DISCOVERY CUT-OFF, EXPERT
DISCLOSURES AND EXPERT
REBUTTAL DISCLOSURES**

Complaint filed: August 13, 2012
Trial date: March 10, 2014

WHEREAS the parties have scheduled a mediation with mediator Jerry Spolter of JAMS in San Francisco to take place on June 28, 2013;

WHEREAS the Court in this matter, on May 28, 2013, issued an Order setting the fact discovery cut-off for July 19, 2013;

WHEREAS the Court’s Order of May 28, 2013, also set the expert disclosure date for July 26, 2013, and the expert rebuttal date for August 30, 2013;

WHEREAS, Local Rule 6-2 dictates that the parties may file a stipulation to change the time of an event already fixed by Court order;

WHEREAS given the parties intent to mediate on June 28, 2013, and corresponding desire not to engage in unnecessary deposition scheduling and preparation or expert consultation prior to

1 mediation, the parties desire to extend the fact discovery cut-off, expert disclosure and rebuttal
2 expert disclosure, each for a period of approximately 40 days;

3 WHEREAS such an extension will not affect the schedule for the case, as all other dates will
4 remain as set: the dispositive motion filing deadline of November 2, 2013; the expert discovery cut-
5 off of November 15, 2013; the pre-trial statement due date of February 18, 2014, the pre-trial
6 conference of February 28, 2014, and the trial of March 10, 2014;

7 IT IS HEREBY STIPULATED TO AND AGREED that the fact discovery cut-off shall be
8 continued from July 19, 2013, to August 30, 2013; the expert disclosure date shall be continued
9 from July 26, 2013, to September 6, 2013; and the expert rebuttal disclosure date shall be continued
10 from August 30, 2013, to October 11, 2013.

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12 Dated: June 11, 2013

THE AGUILERA LAW GROUP, APLC

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/s/ Scott La Salle

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Scott La Salle, Esq.

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Attorneys for Plaintiff ST. PAUL FIRE AND
MARINE INSURANCE COMPANY

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18 Dated: June 11, 2013

**TRENK, DIPASQUALE, DELLA FERA &
SODONO, P.C.**

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/s/ Thomas Holden

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Thomas Holden, Esq.

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Attorneys for Defendants CHARTIS SPECIALTY
INSURANCE COMPANY and LEXINGTON
INSURANCE COMPANY

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25 Dated: June 13, 2013

ERICKSEN ARBUTHNOT

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/s/ Andrew P. Sclar

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Andrew P. Sclar, Esq.

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Attorneys for Defendant VALLEY INSURANCE
COMPANY

1 Dated: June 11, 2013

**COLLIAU CARLUCCIO KEENER MORROW
PETERSON & PARSONS**

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3 /s/ Robert C. Christensen

4 Robert C. Christensen, Esq.
5 Attorneys for Defendants CONTINENTAL
6 CASUALTY COMPANY, NATIONAL FIRE
7 INSURANCE COMPANY OF HARTFORD
8 (successor by merger to TRANSCONTINENTAL
9 INSURANCE COMPANY) and
10 TRANSPORTATION INSURANCE COMPANY

11 **ORDER**

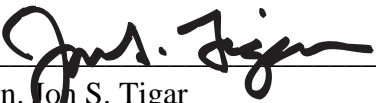
12 Pursuant to stipulation of the parties and good cause existing therefore,

13 **IT IS HEREBY ORDERED** that:

- 14 1) the fact discovery cut-off shall be continued from July 19, 2013, to August 30, 2013;
15 2) the expert disclosure date shall be continued from July 26, 2013, to September 6,
16 2013; and
17 3) the expert rebuttal disclosure date shall be continued from August 30, 2013, to
18 October 11, 2013.

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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22 Dated: June 14, 2013


23 Hon. John S. Tigar
24 United States District Judge