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11 Attorney for Defendant,  
 12 WELLS FARGO BANK, N.A.

13 **UNITED STATES DISTRICT COURT**  
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15  
 16 SUSAN PACINI, an individual,  
 17 Plaintiff,  
 18 vs.  
 19 WELLS FARGO BANK, N.A., a Delaware  
 20 business entity; and DOES 1 through 100,  
 inclusive,  
 21 Defendants.

Case No.: 3:12-CV-04605-RS

[Hon. Richard Seeborg]

**STIPULATION TO EXTEND EXPERT  
 WITNESS DISCOVERY DEADLINES  
 AND ~~PROPOSED~~ ORDER**

Trial Date: September 8, 2014

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**RECITALS**

This stipulation is entered into by and between Plaintiff SUSAN PACINI and Defendant WELLS FARGO BANK, N.A. The parties, by and through their counsel of record, hereby stipulate and agree as follows:

1. WHEREAS, the Court ordered all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) be completed on or before April 4, 2014 in the April 15, 2013 Case Management Scheduling Order;
2. WHEREAS, the trial in the above matter is set for September 8, 2014;
3. WHEREAS, absent a stipulation or a court order, the parties must disclose expert testimony at least 90 days before the date set for trial;
4. WHEREAS, the parties agree to stipulate to extend expert witness discovery deadlines.

**STIPULATION**

Plaintiff SUSAN PACINI and Defendant WELLS FARGO BANK, N.A., by and through their counsel of record, agree and stipulate as follows:

1. The date for disclosure of expert testimony pursuant to Federal Rule of Civil Procedure 26(a)(2)(D)(i) shall be April 4, 2014.
2. The date for discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be extended from April 4, 2014 to May 30, 2014.

IT IS HEREBY AGREED TO AND STIPULATED.

Dated: February 14, 2014

MELLEN LAW FIRM

By:           /s/ Sarah Adelaars            
Sarah Adelaars, Esq.  
Attorney for Plaintiff  
SUSAN PACINI

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Dated: February 14, 2014

ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP

By:           /s/ Michael Rapkine            
Michael Rapkine, Esq.  
Attorney for Defendant  
WELLS FARGO BANK, N.A.

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~~**PROPOSED ORDER**~~

Having reviewed the stipulation of Plaintiff SUSAN PACINI and Defendant WELLS FARGO BANK, N.A. and good cause appearing therefore,

1. The date for disclosure of expert testimony pursuant to Federal Rule of Civil Procedure 26(a)(2)(D)(i) shall be April 4, 2014.
2. The date for discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be extended from April 4, 2014 to May 30, 2014.

**IT IS SO ORDERED.**

Dated: 2/19/14

  
\_\_\_\_\_  
Honorable Richard Seeborg  
United States District Judge