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11 Attorney for Plaintiffs
 JOSE and YADIRA FLORES dba LA ROSA MARKET

12 UNITED STATES DISTRICT COURT
 13
 14 NORTHERN DISTRICT OF CALIFORNIA

15 JOSE FLORES, an individual, and
 YADIRA FLORES, an individual, dba
 16 LA ROSA MARKET,

17 Plaintiffs,

18 v.

19 STATE FARM GENERAL INSURANCE
 COMPANY, an Illinois Company, and DOES
 20 1 through 15,

21 Defendants.

CASE NO. CV 13-05348 VC

**STIPULATION AND ~~PROPOSED~~
 ORDER TO PARTIALLY REVISE
 THE COURT'S SCHEDULING
 ORDER**

22
 23 Plaintiffs and State Farm General Insurance Company ("State Farm"), by and through their
 24 respective counsel, hereby stipulate to revise the Court's February 18, 2014 Pretrial Schedule (Dkt
 25 18) as follows:

26 **I.
 RECITALS**

27 1. The parties have been working diligently toward moving this case forward in an
 28 efficient, expeditious manner. The current deadline to complete fact discovery is October 24, 2014.

1 Despite the parties' diligent efforts and cooperation to complete the depositions of fact witnesses,
2 there are certain fact witnesses whose depositions cannot be scheduled by that date due to the lack of
3 mutually available dates between and among counsel and the remaining witnesses. For that reason,
4 the parties have agreed to stipulate to a proposed order extending the deadline for fact discovery, and
5 the deadlines for expert disclosure, rebuttal disclosure and expert discovery, to enable the parties to
6 complete fact and expert discovery without incurring undue burden and expense.

7 2. The parties do not seek to continue any deadlines other than the deadlines for fact
8 discovery, expert disclosure, rebuttal disclosure and expert discovery. The parties do not seek to
9 continue the trial date or the pretrial conference date.

10
11 **II.**
STIPULATION

12 The parties hereby stipulate to the following revisions to the court's Pretrial Schedule:

- 13
- | | | |
|----|----------------------------|--|
| 14 | 1. Discovery Cutoff | January 16, 2015
(currently October 24, 2014) |
| 15 | 2. Expert Disclosure | January 30, 2015
(currently November 21, 2014) |
| 16 | | |
| 17 | 2. Expert Rebuttal | February 13, 2015
(currently December 19, 2014) |
| 18 | | |
| 19 | 2. Expert Discovery Cutoff | February 27, 2015
(currently January 30, 2015) |
| 20 | | |

21 Dated: September 30, 2014

HEREFORD KERLEY, LLP

22
23 By /S/ Dylan L. Schaffer

J. EDWARD KERLEY

DYLAN L. SCHAFFER

Attorney for Plaintiffs

JOSE and YADIRA FLORES dba LA ROSA

MARKET

1 Dated: September 30, 2014

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

2
3 By /S/ Stephen P. Ellingson

4 STEPHEN M. HAYES
5 STEPHEN P. ELLINGSON
6 CHERIE M. SUTHERLAND
7 Attorneys for Defendant
8 STATE FARM GENERAL INSURANCE
9 COMPANY

~~PROPOSED~~ ORDER

8 Pursuant to the parties' stipulation, the Pretrial Schedule is revised as follows:

- | | | |
|----|----------------------------|--|
| 10 | 1. Discovery Cutoff | January 16, 2015
(currently October 24, 2014) |
| 11 | 2. Expert Disclosure | January 30, 2015
(currently November 21, 2014) |
| 12 | | |
| 13 | 2. Expert Rebuttal | February 13, 2015
(currently December 19, 2014) |
| 14 | | |
| 15 | 2. Expert Discovery Cutoff | February 27, 2015
(currently January 30, 2015) |
| 16 | | |

17 The remaining dates and deadlines set forth in the Civil Minutes dated February 18, 2014 (Dkt
18 18) remain unchanged.

19
20
21 Dated: October 1, 2014

