

MOUND COTTON WOLLAN & GREENGRASS
1900 POWELL STREET SUITE 600
EMERYVILLE, CALIFORNIA 94608
TELEPHONE: (510) 900-9371 FACSIMILE: (510) 900-9381

1 Jonathan Gross, State Bar No. 122010
jgross@moundcotton.com
2 Sheila Addiego, State Bar No. 168365
saddiego@moundcotton.com
3 Elaine Videa, State Bar No. 216718
evidea@moundcotton.com
4 MOUND COTTON WOLLAN & GREENGRASS
1900 Powell Street, Suite 600
5 Emeryville, California 94608
Telephone: (510) 900-9371
6 Facsimile: (510) 900-9381
7 Attorneys for Defendant
ZURICH AMERICAN INSURANCE COMPANY

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 RANDY STEVENS, et al.,

14 Plaintiffs,

15 v.

16 ZURICH AMERICAN INSURANCE
COMPANY,

17 Defendant.

Case No. 3:14-cv-02043-SC

**MODIFIED
STIPULATION AND PROPOSED
SCHEDULING ORDER**

Honorable Samuel Conti
Dept: Ctrm. 1, 17th Floor
Trial Date: None

19 **I. STIPULATION**

20 Come now the undersigned parties, by and through their respective counsel of record, and
21 hereby stipulate as follows:

22 1. Plaintiffs' recently produced approximately 2,800 pages of additional documents.

23 Thus, Zurich American was required to continue the deposition of Plaintiff Stevens, which had
24 been set for February 10, 2015, in order to review the recently produced documents in advance of
25 his deposition. This deposition is now on scheduled to take place on March 6, 2015. In addition,
26 Zurich American continued the deposition of witness Ben Turnbow to March 4, 2015.

27 2. The deposition testimony of those witnesses is necessary for both parties' Motions
28 for Summary Judgment, currently set to be filed on March 12, 2015 pursuant to this Court's

1 November 19, 2014 Scheduling Order.

2 7. Therefore, the parties stipulate to the following new Scheduling Order for Cross-
3 Motions for Summary Judgment pursuant to the Clerk's Notice Vacating Case Management
4 Conference dated August 6, 2014:

- 5 **May 14, 2015** Last Day for Plaintiff and Defendant to File Motions for
6 **May 28, 2015** Last Day for Plaintiff and Defendant to File Oppositions to
7 **June 4, 2015** Last Day for Plaintiff and Defendant to File Replies to
8 **June 26, 2015** Motions for Summary Judgment
9 ~~**June 19, 2015**~~ Hearing on Plaintiff's and Defendant's Motions for Summary
10 Judgment

11 Dated: February 18, 2015

/s/ Vincent Spohn
Vincent M. Spohn, APC
1005 Jefferson Street
PO Box 5748
Napa, CA 94581
Attorney for Randy Stevens, Elissa Stevens, dba
Flamingo Properties

16 Dated: February 18, 2015

/s/ Jonathan Gross
Jonathan Gross
Sheila Addiego
MOUND COTTON WOLLAN & GREENGRASS
1900 Powell Street, Suite 600
Emeryville, CA 94608
Attorneys for Zurich American Insurance Company

21 **II. ORDER**

22 HAVING COME before the court on the above Stipulation and Order, the parties' proposed
23 Scheduling Order is hereby adopted by this Court.

24 Dated: 02/19/2015

25 Honorable _____

