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11 Attorney for Plaintiff
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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 MICHAEL WALKER, TASHELL
 MITCHEL,

17 Plaintiffs,

18 v.

19 UNITRIN AUTO AND HOME INSURANCE
 20 COMPANY, FINANCIAL INDEMNITY
 COMPANY, UNITRIN DIRECT
 21 PROPERTY AND CASUALTY COMPANY
 and DOES 1 TO 25, inclusive,

22 Defendants.

Case No. 3:14-cv-03161--EMC

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 DEADLINE TO FILE DISCOVERY
 MOTIONS**

[CIVIL L.R. 6-1(b); 6-2; 7-12]

1 Plaintiff Michael Walker and defendant Financial Indemnity Company ("FIC"), through
2 their respective undersigned counsel and pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, hereby
3 respectfully submit the following Joint Stipulation and [Proposed] Order to Continue the
4 Deadline to File Expert Discovery Motions.

5 **STIPULATION**

6 WHEREAS, the Court issued a Scheduling Order on July 31, 2015 setting trial and pre-
7 trial deadlines, including a deadline to complete non-expert discovery by October 8, 2015 (ECF
8 No. 65);

9 WHEREAS, pursuant to Civil L.R. 37-3, the deadline to file motions to compel fact
10 discovery is October 15, 2015;

11 WHEREAS, the parties are currently still attempting to meet and confer to resolve
12 outstanding issues regarding fact discovery and request additional time to continue these efforts
13 before filing a joint letter brief with the Court regarding these issues;

14 WHEREAS, the parties hereby stipulate and respectfully request that the Court continue
15 the deadline to file a joint letter brief regarding fact discovery until October 22, 2015.

16 DATED: October 15, 2015

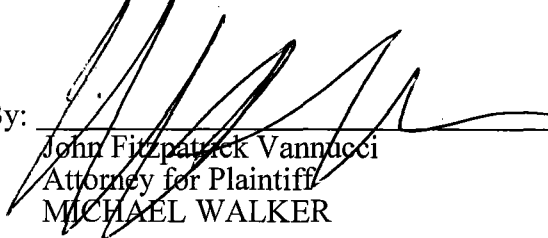
SEDGWICK LLP

17
18 By: 

19 Nicholas J. Boos
20 Kara L. DiBiasio
21 Attorneys for Defendant
22 FINANCIAL INDEMNITY COMPANY

23 DATED: October 15, 2015

LAW OFFICES OF JOHN FITZPATRICK VANNUCCI

24 By: 

25 John Fitzpatrick Vannucci
26 Attorney for Plaintiff
27 MICHAEL WALKER

28 *Attestation Regarding Signatures: Pursuant to Civil Local Rule 5-1(i)(3), Kara L. DiBiasio hereby attests that concurrence in the filing of the document has been obtained from each of the other signatories identified above, which shall serve in lieu of their signatures on the document.*

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, it is hereby ORDERED that the deadline for the parties to file joint letter briefs regarding non-expert discovery shall be continued until October 22, 2015.

IT IS SO ORDERED.

DATED: 10/19/15

