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 12 Attorneys for Plaintiffs
 13 SCOTT EMERSON FELIX and
 PATRICIA LOVEHAL SHUEY

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 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

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 18 SCOTT EMERSON FELIX and PATRICIA
 19 LOVEHAL SHUEY,

Case No. 3:14-cv-03809-HSG

20 Plaintiffs,

**JOINT STIPULATION TO EXTEND
 DISCOVERY DEADLINES
 PURSUANT TO LOCAL RULE 6-2;
~~PROPOSED~~ ORDER**

21 vs.

22 KARIN L. ANDERSON; and DOES 1-10,
 23 inclusive,

24 Defendants.

25 Plaintiffs Scott Felix and Patricia Shuey (“Plaintiffs”) together with defendant Karin L.
 26 Anderson (“Defendant”), by and through their respective attorneys, do hereby agree and stipulate
 27 as follows:

28 WHEREAS Plaintiffs filed this lawsuit on August 21, 2014;

1 WHEREAS on February 9, 2015, this Court entered an order granting leave to serve
2 summons upon Defendant by publication, finding that Plaintiffs “made exhaustive efforts to serve
3 Defendant by other means” and that “the evidence suggests that Defendant is aware of the pending
4 litigation against her and is evading service;”

5 WHEREAS on June 30, 2015, Defendant appeared in this case and filed her Answer to the
6 complaint;

7 WHEREAS on July 24, 2015, Defendant filed a motion for judgment on the pleadings,
8 which motion was granted with leave to amend by this Court’s order entered August 20, 2015;

9 WHEREAS on September 10, 2015, Plaintiffs filed their First Amended Complaint in this
10 action;

11 WHEREAS on September 28, 2015, Defendant filed a motion to dismiss Plaintiffs’ First
12 Amended Complaint, which motion was heard and denied on November 5, 2015;

13 WHEREAS on November 5, 2015, this Court issued a scheduling order which set the
14 deadline for fact discovery as March 1, 2016, and the deadline for expert discovery as April 1,
15 2016;

16 WHEREAS following the hearing on the motion to dismiss, Plaintiffs began and are in the
17 process of substituting attorneys in this action, which process has contributed to the delay in initial
18 disclosures in this action;

19 WHEREAS in the rule 26(f) conference on December 14, 2015, Plaintiffs and Defendant
20 agreed that given the short time frame, and the fact that no discovery had then been propounded, it
21 was impracticable and unlikely that discovery would be completed by the February 1, 2016 and
22 March 1, 2016 deadlines established by this Court’s November 9, 2015 scheduling order;

23 WHEREAS Plaintiffs and Defendant wish to preserve the July 25, 2016 trial date in this
24 matter while also allowing for additional time for the completion of discovery;

25 IT IS HEREBY STIPULATED AND AGREED:

- 26 1. The deadline for the close of fact discovery shall be extended from February 1, 2016,
27 to April 1, 2016;

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