Kottom v. Walker et al Doc. 81

1 Terrence Clayton Posey (WA Bar No. 9570) B. Douglas Robbins (219413) TERRENCE CLAYTON POSEY, P.S. Mona Tashroudian (272387) 2 1119 A Street, Suite 101 WOOD ROBBINS, LLP P.O. Box 1364 One Post Street, Suite 800 3 Tacoma, WA 98401 San Francisco, CA 94104 T: 415.247.7900; F: 415.247.7901 T: 253.383.1014; F: 253.383.1039 4 terryposeyps@yahoo.com drobbins@woodrobbins.com 5 **Pro Hac Vice Attorneys for Plaintiff** Kathleen E. Kottom 6 William M. Hake, Esq. (SBN 110956) Nicolas P. Martin, Esq. (SBN 267708) 7 WILSON ELSER MOSKOWITZ EDELMAN & 8 DICKER LLP 525 Market Street, 17th Floor 9 San Francisco, CA 94105 T: (415) 433-0990; F: (415) 434-1370 10 Bill.Hake@wilsonelser.com Nick.Martin@wilsonelser.com 11 **Attorneys for Defendant** 12 Albert Dan Walker 13 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 KATHLEEN E. KOTTOM, individually, and as Case No. 3:14-cv-04492-LB (KW) 17 surviving trustee of the Paul and Kathleen Kottom Living Trust, JOINT STIPULATED [PROPOSED] 18 UPDATED CASE-MANAGEMENT 19 Plaintiff, SCHEDULING ORDER 20 v. 21 ALBERT DAN WALKER, an individual; and 22 FARMERS NEW WORLD LIFE INSURANCE COMPANY, a Company, 23 Defendants. 24 25 Per the Court's Order following the Further Case Management Conference held on September 26 3, 2015, Plaintiff Kathleen Kottom and Defendant Albert Dan Walker (collectively the "Parties") 27 jointly stipulate to the following Updated Case-Management Scheduling Order. 28

## UPDATED CASE-MANAGEMENT SCHEDULING ORDER AND DISCOVERY PLAN

All hearings will be held in Courtroom C, 15<sup>th</sup> Floor, U.S. District Court, 450 Golden Gate Avenue, San Francisco, California. The following are the disclosure, filing, discovery and hearing dates agreed to by the parties for the case:

Case Event	Filing Date/Disclosure Deadline/Hearing Date
Date to filed First Amended Complaint	09/10/2015
Walker's Response to FAC	09/30/2015
Updated Joint Case Management Conference Statement	9/24/2015
Further Case Management Conference	10/1/2015 at 11:00 a.m.
Non-Expert Discovery Completion Date (Party and Third-Party Discovery)	12/10/2015
Deadline to File Non-Expert Discovery Motions (Party and third-Party Discovery)	1/21/2016
Expert Disclosure Required by Federal Rules of Civil Procedure	Plaintiff's Proposed Date: 12/10/2015
	<b>Defendant's Proposed Date:</b> 01/15/2016
Rebuttal expert disclosures	Plaintiff's Proposed Date: 12/28/2015
	<b>Defendant's Proposed Date:</b> 02/15/2016
Expert discovery completion date	Plaintiff's Proposed Date: 01/20/2016
	<b>Defendant's Proposed Date:</b> 02/29/2016
Deadline to File Dispositive Motion(s) and Non-Expert Discovery Motions (Party and Third-Party)	01/21/2016
Deadline to File Opposition to Dispositive Motion(s) and Non-Expert Discovery Motions (Party and Third-Party)	02/04/2016 (per Civ. L.R. 7-3(a))

1	Deadline to File Reply to Dispositive Motion(s) and Non- Expert Discovery Motions (Party and Third-Party)		02/11/2016 (per Civ. L.R. 7-3(c))	
3	Last hearing date for dispositive motions and/or further case management conference and/or Non-Expert Discovery Motions (Party and Third-Party)		02/25/2016 at 9:30 a.m. (per Civ. L.R. 7-2(a))	
5	Meet and Confer regarding pretrial filing			02/29/2016
6	Last Hearing Date for Expert Witness Motions			Plaintiff's Proposed Date: 03/03/2016
7 8				Defendant's Proposed Date: 03/24/2016 at 9:30 a.m.
9	Pretrial filings due			03/03/2016
10	Oppositions, Objections, Exhibits, and Depo Designations Due		03/10/2016	
12	Final Pretrial Conference			03/24/2016 at 1:30 p.m.
13	Trial	Trial		04/04/2016 at 8:30 a.m.
14	Length of Trial		5 days	
15 16 17 18		The parties may adjust the motion d  STIPULATED, through Counsel		y deadlines by stipulation.
19	Date:	September 24, 2015	WILSON ELS & DICKER L	SER MOSKOWITZ EDELMAN LP.
20 21 22 23			By: Nicolas P. Ma <b>Attorney for</b> <b>Albert Dan V</b>	artin, Esq. <b>Defendant</b>
24 25	Dated:	September 24, 2015	WOOD ROB	BINS, LLP
26			$R_{V}$	//s//
27			Mona Tashroi  Attorney for	udian
28				E. KOTTOM
-	JPDATED CMC SCHED, ORD.			

UPDATED CMC SCHED. ORD. Case No. 3:14-cv-04492-LB (KW)

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2	IT IS ORDERED that the forgoing Stipulation is approved. This Stipulated Order amends and				
3	supersedes the Case Management and Pretrial Order, of January 16, 2015, ECF No. 33. As for any				
4	issues not raised herein, the January 16, 2015 Order, ECF No. 33 continues to control.				
5	D. ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (				
6	Dated: October 6 , 2015 By: UNITED STATES MAGISTRATE JUDGE				
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