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 BRET MACDONALD and AMALIA MACDONALD
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14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 BRET MACDONALD, an individual; and
 17 AMALIA MACDONALD, an individual,
 18 Plaintiffs,
 19 vs.
 20 WELLS FARGO BANK, N.A. and
 DOES 1 through 50, inclusive,
 21 Defendants.
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Case No.: 3:14-CV-04970-HSG

**JOINT STIPULATION TO CONTINUE
 EXPERT DISCOVERY CUT-OFF
 DEADLINE; ~~PROPOSED~~ ORDER**

Action Filed: November 10, 2014
 Trial Date: May 1, 2016

1 Pursuant to the Civil Local Rules of the United States District Court for the Northern
2 District of California, the parties, Plaintiffs BRETT MACDONALD and AMALIA
3 MACDONALD (“Plaintiffs”), and Defendant WELLS FARGO BANK, N.A. (“Wells Fargo”),
4 through their counsel of record, hereby stipulate to the following:

5 WHEREAS, on November 10 2014, Plaintiff filed her Complaint in the above-captioned
6 court against Defendants;

7 WHEREAS, on April 12, 2016, the Court issued a Scheduling Order, setting Expert
8 Discovery Cutoff for October 25, 2016;

9 WHEREAS, the Expert Discovery Cut-off deadline has been continued by the Court,
10 following the parties stipulations, to January 27, 2017;

11 WHEREAS, Plaintiffs submitted their Initial Expert Disclosure on December 9, 2016,
12 disclosing the intent to use an expert to testify at trial on Plaintiffs’ behalf;

13 WHEREAS, Defendant designated a Rebuttal Expert on December 23, 2016;

14 WHEREAS, the medical experts that have been designated by both parties have schedules
15 that have made it difficult to obtain deposition dates that work for all parties;

16 WHEREAS, Defendant’s deposition of Plaintiff’s Expert is currently scheduled for
17 January 27, 2017 and Plaintiffs’ deposition of Defendant’s Expert is currently scheduled for
18 February 20, 2017;

19 WHEREAS, the Parties request that the deadline to conduct all Expert Discovery be
20 extended to February 20, 2017;

21 WHEREAS, no other deadlines in this matter will be affected by the requested
22 continuance.

23 **STIPULATION**

24 The parties stipulate to and request continuance of the Expert Discovery Cut-off Deadline
25 to February 20, 2017.
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Respectfully Submitted,

Dated: January 24, 2017

SEVERSON & WERSON

By: /s/ Jason M. Julian
Jason M. Julian, Esq.
Attorney for Defendant
WELLS FARGO BANK, N.A.

Dated: January 24, 2017

MELLEN LAW FIRM

By: /s/ Sarah Shapero
Sarah Shapero, Esq.
Attorney for Plaintiffs
BRETT MACDONALD and AMALIA
MACDONALD

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ORDER

This Court, having received and reviewed the stipulation of the parties referenced immediately above, and finding good cause therefore, pursuant to the stipulation of the parties;

The expert discovery cut-off deadline is continued to February 20, 2017.

IT IS SO ORDERED.

Dated: January 30, 2017


Honorable Haywood S. Gilliam, Jr.