

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Andrew V. Stearns
BUSTAMANTE & GAGLIASSO, APC
333 W. San Carlos St., Ste. 600
San Jose, CA 95110
Tel.: 408-977-1911, Fax: 408-977-0746
Email: astearns@boglawyers.com

Attorney for Plaintiff
MARK MIGDAL

SONIA MARTIN (SBN 191148)
MENGMENG ZHANG (SBN 280411)
DENTONS US LLP
525 Market Street, 26th Floor
San Francisco, CA 94105-2708
Telephone: (415) 882-5000
Facsimile: (415) 882-0300
E-mail: sonia.martin@dentons.com
mengmeng.zhang@dentons.com

Attorneys for Defendant
AMCO INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARK MIGDAL, an individual,

Plaintiff,

vs.

AMCO Insurance Company, an Iowa
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 3:15-cv-02496-WHO

**STIPULATION REGARDING
DISCOVERY AND MOTION
DEADLINES**

Plaintiff Mark Migdal and Defendant AMCO Insurance Company, through their undersigned counsel, hereby stipulate as follows and respectfully request that the Court approve and give effect to their stipulation:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREAS, AMCO’s counsel requested proposed dates for Plaintiff’s deposition in early December 2015 and renewed that request on January 7, 2016;

WHEREAS, Plaintiff responded that, due to his extensive travels outside the country, the first date on which he could be available for deposition would be during the week of February 22, 2016;

WHEREAS, the parties have now scheduled Plaintiff’s deposition for March 3, 2016;

WHEREAS, the parties wish to allow sufficient time following Plaintiff’s deposition for follow-up discovery;

WHEREAS, a brief continuance of the discovery and dispositive motion deadlines in this case will not impact the September 19, 2016 bench trial date in this matter;

IT IS HEREBY STIPULATED AND AGREED THAT the case management schedule should be revised as follows:

	<u>Current Deadline</u>	<u>New Deadline</u>
Non-expert discovery cut-off:	April 8, 2016	June 10, 2016
FRCP 26(a)(2) expert disclosures:	April 22, 2016	May 20, 2016
FRCP 26(a)(2) rebuttal disclosures:	May 10, 2016	June 7, 2016
Expert Discovery cut-off:	June 10, 2016	July 8, 2016
Dispositive pre-trial motion hearing cut-off:	June 10, 2016	August 8, 2016
Pretrial conference statements:	June 24, 2016	August 15, 2016
Pretrial conference:	July 11, 2016	August 22, 2016

Respectfully submitted,

Dated: February 16, 2016

BUSTAMANTE & GAGLIASSO, APC

By /s/ Andrew V. Stearns
ANDREW V. STEARNS

Attorneys for Plaintiff
MARK MIGDAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: February 16, 2016

DENTONS US LLP

By /s/ Sonia Martin
SONIA MARTIN

Attorneys for Defendant
AMCO INSURANCE COMPANY

FILER'S ATTESTATION:

Pursuant to Local Rule 5-(i)(3) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

DATED: February 16, 2016

By: /s/ Sonia Martin
SONIA MARTIN

ORDER

This Stipulation is DENIED without prejudice. The parties shall incorporate their scheduling requests in the Joint Case Management Conference Statement due on March 1, 2016 and be prepared to discuss this at the hearing on March 9, 2016.

DATED: February 17, 2016

 W. H. Orrick
HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE