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12 Attorneys for Defendant
 IRONSHORE SPECIALTY
 13 INSURANCE COMPANY

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 SAARMAN CONSTRUCTION, LTD., a
 California Corporation,

18 Plaintiff,

19 v.

20 IRONSHORE SPECIALTY INSURANCE
 21 COMPANY, an Arizona Corporation; and
 DOES 1 through 50, inclusive,

22 Defendants.
 23

Case No. 3:15-cv-03548-JST

STIPULATION TO EXTEND DEADLINE
 FOR EXPERT DEPOSITIONS; [~~PROPOSED~~]
 ORDER

24 WHEREAS, the deadline to take expert depositions in this action pursuant to the Court's
 25 Order of August 26, 2016 (ECF No. 95), is October 21, 2016;

26 WHEREAS, Defendant Ironshore Specialty Insurance Company ("Ironshore") timely
 27 disclosed its expert and provided its expert's report to Plaintiff Saarman Construction, Ltd.
 28 ("Saarman") on September 23, 2016, in accordance with the Court's Order;

1 WHEREAS, counsel for Ironshore has a pre-scheduled vacation during the second half of
2 October 2016, and while counsel can conduct the deposition of Saarman's expert on October 17,
3 2016, they are unable to take Ironshore's expert deposition until November 1, 2016;

4 AND WHEREAS, the deadline for taking expert depositions can be extended from
5 October 21 to November 2, 2016, without any impact on the Court's schedule, as the discovery
6 phase in this action is otherwise closed, dispositive motions have already been heard, the pre-trial
7 conference is scheduled for January 4, 2017, and trial is scheduled to begin on January 30, 2017.

8 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff Saarman
9 and Defendant Ironshore, by and through their designated counsel, that the deadline to take expert
10 depositions in this action be extended from October 21, 2016, to November 2, 2016.

11 Dated: October 10, 2016

Respectfully submitted,
LAW OFFICES OF SAMUEL F. BARNUM

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14 By: /s/ Samuel F. Barnum
Samuel F. Barnum

15 Attorneys for Plaintiff
16 SAARMAN CONSTRUCTION, LTD

17 Dated: October 10, 2016

MORISON & PROUGH, LLP

18
19 By: /s/ William C. Morison
William C. Morison

20 Attorneys for Defendant
21 IRONSHORE SPECIALTY INSURANCE CO.

22
23 **[PROPOSED] ORDER**

24 PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

25
26 DATED: October 11, 2016



Honorable Jon S. Tigar

27 ID405