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 7 Attorneys for Defendant
 JOHN PAUL WILLIAMS

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11 GARY MARTINOVSKY, M.D., and
 12 INTEGRATED PAIN CARE, INC.,

Case No. 3:16-cv-00403-MMC

13 Plaintiffs,

**REVISED STIPULATION TO EXTEND
 DISCOVERY DEADLINES AND CONTINUE
 TRIAL DATE; ~~PROPOSED~~ ORDER**

14 v.

15 DA INSPECTOR JOHN PAUL WILLIAMS,
 16 CALIFORNIA DEPARTMENT OF
 INSURANCE DETECTIVE FERNANDO
 17 CUBANGBANG, and DOES 1 to 20,

18 Defendants.

Hon. Maxine M. Chesney

19
 20 **STIPULATION**

21 IT IS HEREBY STIPULATED AND REQUESTED BY the parties to the above-captioned
 22 matter that all pretrial dates in this matter be continued by ninety (90) days and that the trial date be
 23 continued from March 5, 2018 to June 11, 2018, or a date thereafter that is convenient to the Court.

24 By Order dated March 13, 2017, a Settlement Conference before Magistrate Judge Laurel Beeler
 25 was scheduled for July 26, 2017. Plaintiff's counsel is set for trial in the matter of Rivera v. City of
 26 Ontario, C.D. Cal. Case No. 16-CV-1618-JFW-KK, which is scheduled to commence on July 25, 2017
 27 for a four-day jury trial. Additionally, the third-party administrator representative for JP WILLIAMS is
 28 unavailable to attend the settlement conference due to a pre-scheduled vacation. Finally, the parties wish

1 to complete certain limited key discovery prior to the settlement conference, and said discovery has been
2 delayed due to scheduling conflicts.

3 Attorneys for WILLIAMS notified Magistrate Judge Beeler's clerk that there was a conflict and
4 requested other dates for the conference. In response, Magistrate Judge Beeler issued an Order
5 scheduling a conference call with the parties for June 15, 2017. (Docket No. 74.) During the conference,
6 the parties and Court selected October 24, 2017 for a settlement conference, subject to this Court's
7 approval of this stipulation.

8 Following the conference, Judge Beeler issued a minute order, (Docket No. 75), stating the
9 following:

10 The parties developed a conflict with the settlement conference that the court set
11 previously in July. The court thus had a settlement conference call and now sets the case
12 for 10/24/2017. The court offered earlier dates, but this is the earliest date that worked for
everyone's schedule.

13 The continuance of dates requested herein will permit the parties to conduct discovery in order to
14 meaningfully participate in a settlement conference, and will permit time to complete remaining
15 necessary after the settlement conference in the event that the parties do not reach an agreement at the
16 settlement conference.

17 For the reasons set forth above, the parties respectfully request that this Court continue all
18 previously-set dates (as contained in Docket No. 70) as follows:

| 19 Event | Current Dates | Proposed Dates |
|---|----------------------|-----------------------|
| 20 Non-Expert Discovery Cutoff | 9/18/2017 | 12/18/2017 |
| 21 Expert Disclosures | 10/16/2017 | 1/15/2018 |
| 22 Disclosure of Rebuttal Experts | 10/27/2017 | 1/25/2018 |
| 23 Expert Discovery Cutoff | 11/17/2017 | 2/15/2018 |
| 24 Last Day to File Dispositive Motions | 12/1/2017 | 3/1/2018 |
| 25 Pretrial Conference | 2/20/2018 | 5/22/2018 |
| 26 Trial | 3/5/2018 | 6/11/2018 |

1 The parties respectfully request that the Court approve this stipulation and incorporate its terms in
2 an Order.

3 **IT IS SO STIPULATED.**

4
5 Dated: July 6, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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7 By: /s/ Michael Wenzel
Michael C. Wenzel
8 Attorneys for Defendant
JOHN PAUL WILLIAMS
9

10 Dated: July 6, 2017

ATTORNEY GENERAL OF CALIFORNIA

11
12 By: /s/ John Devine
John Devine
13 Attorneys for Defendant
FERNANDO CUBANGBANG
14

15 Dated: July 6, 2017

THE LAW OFFICES OF JOHN BURTON

16
17 By: /s/ John Burton
John Burton
18 Attorneys for Plaintiffs
GARY MARTINOVSKY, M.D., and INTEGRATED
19 PAIN CARE, INC.
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21 **ATTORNEY ATTESTATION**

22 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
23 conformed signature (“/s/”) within this E-filed document or have been authorized by all parties to show
24 their signature on this document as /s/.

25
26 Dated: July 6, 2017

By: /s/ Michael Wenzel
Michael C. Wenzel
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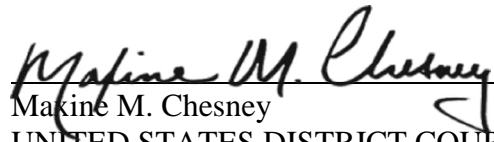
1 **ORDER**

2 GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
3 parties' stipulation is hereby APPROVED. The Court orders the following deadlines:

| 4 Event | Date |
|--|-------------|
| 5 Non-Expert Discovery Cutoff | 12/18/2017 |
| 6 Expert Disclosures | 1/15/2018 |
| 7 Disclosure of Rebuttal Experts | 1/25/2018 |
| 8 Expert Discovery Cutoff | 2/15/2018 |
| 9 Last Day to File Dispositive Motions | 3/1/2018 |
| 10 Pretrial Conference | 5/22/2018 |
| 11 Trial | 6/11/2018 |

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13
14 **IT IS SO ORDERED.**

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16 Dated: July 7, 2017


Makine M. Chesney
UNITED STATES DISTRICT COURT JUDGE