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5 Attorneys for Defendant  
 6 THE BURLINGTON  
 INSURANCE COMPANY

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10  
 11 PETER GREENBAUM,

12 Plaintiff;

13 v.

14 THE BURLINGTON INSURANCE  
 COMPANY,

15 Defendant.  
 16

Case No. 16-cv-00511-RS

**STIPULATION TO EXTEND THE  
 EXPERT DISCOVERY CUT-OFF;  
~~[PROPOSED]~~ ORDER**

17 WHEREAS, Defendant’s rebuttal expert disclosure is due on March 2, 2017;

18 WHEREAS, the cut-off date for expert discovery in this matter is currently March 7, 2017;

19 WHEREAS, the parties’ expert witnesses are not available for deposition until after March 7,  
 20 2017;

21 WHEREAS, Defendant’s motion for summary judgment is scheduled for hearing on March  
 22 16, 2017;

23 WHEREAS, the parties agree that it would be mutually beneficial to conduct expert  
 24 depositions in April 2017;

25 WHEREAS, there has been one previous time modification in this case, in that the Court  
 26 approved a stipulation to take certain depositions after the non-expert discovery cut-off, but that  
 27 stipulation was later mooted by the Court continuing Defendant’s motion for summary judgment to  
 28 permit some of those depositions;

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WHEREAS, no other deadlines will be affected by extending the expert discovery cut-off;  
THEREFORE, the parties to this action, through their counsel of record, hereby STIPULATE  
as follows:  
Defendant shall take the deposition of plaintiff's expert witness, David Frangiamore, in  
Phoenix, Arizona, on April 11, 2017;  
Plaintiff shall take the deposition of defendant's expert witness, Gary Selvin, at the office of  
Plaintiff's counsel, on April 18, 2017;  
The cut-off date for expert discovery is hereby extended to April 18, 2017, to allow for these  
depositions, and following completion of these depositions expert discovery shall be closed.

Dated: March 1, 2017 GREENBERG TRAUERIG, LLP


By: \_\_\_\_\_  
/s/ Thomas Holden  
Thomas Holden  
  
Attorneys for Defendant  
THE BURLINGTON INSURANCE  
COMPANY

Dated: March 1, 2017 MILES & WESTBROOK

By: \_\_\_\_\_  
/s/ Brian B. Miles  
Brian B. Miles  
  
Attorneys for Plaintiff  
PETER GREENBAUM

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 3/1 \_\_\_\_\_, 2017

\_\_\_\_\_  
  
Richard Seeborg  
United States District Judge