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ATTORNEYS FOR PLAINTIFFS
DAVID CARPENTER, KIM CARPENTER,
INDIVIDUALLY AND AS NEXT FRIEND OF C.
C., A MINOR, AND KIM AGRELLA, TRUSTEE
OF THE CARPENTER FAMILY TRUST

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DAVID CARPENTER, KIM
CARPENTER, individually and as next
friend of C. C., a minor, and KIM
AGRELLA, trustee of THE
CARPENTER FAMILY TRUST,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,
and DOES ONE through TWENTY,
inclusive,

Defendants.

Case No. 3:17-cv-03221-JST

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE TRIAL AND
ALL RELATED DATES

The Hon. Jon S. Tigar

Action Filed: June 5, 2017
Trial Date: Unassigned

To the Honorable Court:

The parties to this action, as well as the parties to the related case of *State Farm General Insurance Company v. Amazon.com, Inc.* (Case No. 3:18-cv-00624-

1 MEJ), hereby stipulate and request as follows:

2 1. The parties to this action have been working diligently and
3 cooperatively to complete discovery and prepare for trial.

4 2. On February 6, 2018, this Court found that the above-mentioned *State*
5 *Farm* case was related to the instant case because the actions concern substantially
6 the same parties, property and accident.

7 3. Continuing the trial date and all related dates would enable all parties
8 to streamline and coordinate the discovery process, and would allow State Farm an
9 adequate period of time conduct discovery prior to trial.¹

10 4. Accordingly, the parties request the following dates be continued
11 pursuant to the proposed deadlines outlined below:

Event	Current Deadline	Proposed Deadline
Fact discovery cutoff	March 30, 2018	October 30, 2018
Deadline to file dispositive motions	March 30, 2018	October 30, 2018
Expert disclosures	April 13, 2018	November 13, 2018
Expert rebuttal	April 30, 2018	November 30, 2018
Expert discovery cutoff	May 18, 2018	December 18, 2018
Pretrial conference statement date	July 10, 2018	February 11, 2019
Pretrial conference	July 20, 2018 at 2:00 p.m.	February 20, 2019 at 2:00 p.m.
Trial	July 30, 2018 at 8:30 a.m.	March 4, 2019 at 8:30 a.m.

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27 ¹ Like State Farm, Nationwide Insurance Company has asserted a lien relating to
28 the house fire giving rise to this action. The parties have inquired whether
Nationwide intends litigate this matter, but have not received a response.

1 SO STIPULATED.

2 Dated: February 28, 2018

WALKUP, MELODIA, KELLY & SCHOENBERGER

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By: _____ /s/

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KHALDOUN A. BAGHDADI

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VALERIE N. ROSE

Attorneys for Plaintiffs

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DAVID CARPENTER, KIM CARPENTER,
INDIVIDUALLY AND AS NEXT FRIEND
OF C. C., A MINOR, AND KIM AGRELLA,
TRUSTEE OF THE CARPENTER FAMILY
TRUST

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Dated: February 28, 2018

LECLAIR RYAN

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By: _____ /s/

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CHARLES HORN

FELICIA P. JAFFERIES

Attorneys for Defendants

AMAZON.COM, INC.

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Dated: February 28, 2018

PILLEMER & PILLEMER

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By: _____ /s/

DAVID B. PILLEMER

ROBIN F. GENCHEL

Attorneys for STATE FARM GENERAL
INSURANCE COMPANY

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1 **ATTORNEY ATTESTATION**

2 I, VALERIE N. ROSE, attest that concurrence in the filing of this document
3 has been obtained from any signatures indicated by a “ conformed” signature (/s/)
4 within this e-filed document. I declare under penalty of perjury that the foregoing is
5 true and correct.

6
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8 Dated:

9 _____
10 VALERIE N. ROSE

11 **~~PROPOSED~~ ORDER**

12 Having considered the stipulated request of the parties, the Court orders as
13 follows:

- 14 1. Good cause having been shown, and in light of the stipulation of the
15 parties, the trial date of July 30, 2018 and all related dates are hereby vacated.
16 2. The Court hereby sets the following case deadlines:

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Event	Deadline
Fact discovery cutoff	October 30, 2018
Deadline to file dispositive motions	October 30, 2018
Expert disclosures	November 13, 2018
Expert rebuttal	November 30, 2018
Expert discovery cutoff	December 18, 2018
Pretrial conference statement date	February 11, 2019
Pretrial conference	February 22, 2019 at 2:00 p.m.
Trial	March 4, 2019 at 8:30 a.m.

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1 IT IS SO ORDERED.

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3 Dated: March 1, 2018

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THE HONORABLE JON S. TIGAR
Judge of the United States District Court

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