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8 THE TRAVELERS INDEMNITY COMPANY OF

9 CONNECTICUT, also erroneously sued as THE

10 TRAVELERS INSURANCE COMPANY; THE

11 TRAVELERS INDEMNITY COMPANY; and

12 TRAVELERS PROPERTY AND CASUALTY

13 COMPANY OF AMERICA

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28 DEBRA ERNST and WILLIAM ERNST

[CAPTION CONTINUED ON NEXT PAGE]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ULISES VALDEZ; VALDEZ & SONS
VINEYARD MANAGEMENT, A
CALIFORNIA CORPORATION,

Plaintiffs,

v.

THE TRAVELERS INDEMNITY COMPANY
OF CONNECTICUT; THE TRAVELERS
INDEMNITY COMPANY; TRAVELERS
PROPERTY AND CASUALTY COMPANY
OF AMERICA; AND THE TRAVELERS
INSURANCE COMPANY,

Defendants.

Case No. 12-CV-4307 SBA

**JOINT STIPULATION FOR
CONTINUANCE OF CERTAIN PRE-
TRIAL DATES; [~~PROPOSED~~] ORDER**

WILLIAM ERNST,

Plaintiff,

v.

THE TRAVELERS INDEMNITY COMPANY
OF CONNECTICUT, THE TRAVELERS
PROPERTY CASUALTY COMPANY OF
AMERICA, and THE TRAVELERS
INSURANCE COMPANY,

Defendants.

Case No. 13-CV-0463 SBA

DEBRA ERNST AND WILLIAM ERNST,

Plaintiffs,

v.

THE TRAVELERS INDEMNITY COMPANY
OF CONNECTICUT, THE TRAVELERS
PROPERTY CASUALTY COMPANY OF
AMERICA, and THE TRAVELERS
INSURANCE COMPANY,

Defendants.

Case No. C-13-CV-0464 SBA

1 WHEREAS, the court in each of the three above-captioned related actions –*Valdez, et*
2 *al. v. The Travelers Indemnity Company of Connecticut, et al.*, United States District Court for
3 the Northern District of California, Case No. 12-cv-4307-SBA, *Ernst v. The Travelers*
4 *Indemnity Company of Connecticut, et al.*, United States District Court for the Northern
5 District of California, Case No. 13-cv-0463-SBA, and *Ernst, et al. v. The Travelers Indemnity*
6 *Company of Connecticut, et al.*, United States District Court for the Northern District of
7 California, Case No. 13-cv-0464-SBA – through its Order for Pretrial Preparation issued on
8 June 27, 2013 (ECF 44), Order for Pretrial Preparation issued on June 27, 2013 (ECF 23), and
9 Consolidated Order for Pretrial Preparation issued on October 28, 2013 (ECF 16), respectively,
10 set the following deadlines, among others:

- 11 • Non-expert discovery completion: **December 20, 2013**
- 12 • Plaintiffs’ designation of experts: **December 20, 2013**
- 13 • Defendants’ designation of experts: **December 20, 2013**
- 14 • Rebuttal disclosure of experts: **January 3, 2014**
- 15 • Expert discovery completion: **January 24, 2014**
- 16 • Dispositive motion cut-off: **February 18, 2014**

17 WHEREAS, the parties have been engaged in discovery in each of the three above-
18 captioned actions, including written discovery, requests for production, third party document
19 subpoenas, and depositions;

20 WHEREAS, the parties continue to be engaged in discovery, and need to take
21 numerous additional depositions, some of which pertain to all three related actions;

22 WHEREAS, based on the discovery to date, and in part to potentially avoid the
23 necessity of taking many of the numerous additional depositions, the parties to the above-
24 captioned *Valdez, et al. v. The Travelers Indemnity Company of Connecticut, et al.* action have
25 agreed to participate in a mediation on November 19, 2013 with Hon. Jack Komar (Ret.), and
26 the plaintiffs in the related *Ernst, et al. v. The Travelers Indemnity Company of Connecticut, et*
27 *al.* actions may also participate in that mediation or a separate mediation with The Travelers
28 Indemnity Company of Connecticut;

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ORDER

Stipulation is DENIED.

Dated: November 8, 2013



HONORABLE SAUNDRA BROWN ARMSTRONG
United States District Court Judge