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 15 NATIONWIDE AGRIBUSINESS
 16 INSURANCE COMPANY

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

DENTONS US LLP
 1999 HARRISON STREET, SUITE 1210
 OAKLAND, CALIFORNIA 94612
 415 882 5000

20 NAPA VALLEY LIMONCELLO LLC, d/b/a
 21 NAPA VALLEY DISTILLERY, a California
 22 limited liability company; NAPASTAK, INC.,
 23 d/b/a NAPASTAK CELLARS, a California
 24 corporation,

25 Plaintiffs,

26 v.

27 NATIONWIDE AGRIBUSINESS
 28 INSURANCE CO., an Iowa corporation, and
 DOES 1-10,

Defendants.

Case No. 4:24-cv-3243- HSG

**RESUBMITTED STIPULATION AND
 ORDER TO EXTEND EXPERT
 REPORT DEADLINES ONLY**

29 Pursuant to Federal Rule of Civil Procedure 16(b)(4), Local Rules 143 and 144, and the Honorable
 30 Haywood S Gilliam, Jr., plaintiffs Napa Valley Limoncello LLC, d/b/a Napa Valley Distillery; Napastak,
 31 Inc., d/b/a Napastak Cellars and defendant Nationwide Agribusiness Insurance Co., by and through their
 32 respective counsels of record, stipulate and agree as follows and respectfully request entry of an order giving
 33 effect to their stipulation:

1 WHEREAS, the parties have been engaging in extensive discovery including, but not limited to:
2 requests for production of documents, requests for admission, interrogatories, negotiating and stipulating to
3 a protective order, supplemental document productions, meeting and conferring to work through multiple
4 discovery disputes without involving the court, and propounding numerous third party subpoenas;

5 WHEREAS, the parties have taken two depositions and need to conduct three more prior to the
6 disclosure of expert reports;

7 WHEREAS, the parties, through no fault of their own, have experienced delays in the production
8 of third party testing documents necessary to conduct the remaining depositions;

9 WHEREAS, pursuant to Local Rule 144(b), the Court has granted one prior request to modify the
10 deadlines in this case (Dkt. 25);

11 WHEREAS, the current case schedule is as follows:

<u>Event</u>	<u>Current Deadline</u>
Exchange of opening expert reports	March 28, 2025
Exchange of rebuttal expert reports	May 5, 2025
Close of fact and expert discovery	June 27, 2025
Dispositive pre-trial motion hearing deadline	August 15, 2025
Pretrial conference:	November 4, 2025
Trial	November 17, 2025

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24 WHEREAS, a continuance of the expert report exchange deadlines is necessary to provide the
25 parties adequate time to complete the depositions necessary as bases for expert reports;

26 WHEREAS, the parties seek to extend the expert exchange report deadlines only;

27 WHEREAS, this will not affect any other dates in the schedule;

28 WHEREAS, the parties agree to move the two dates below as follows:

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<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Exchange of opening expert reports	March 28, 2025	April 30, 2025
Exchange of rebuttal expert reports	March 5, 2025	May 28, 2025

NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

Good cause exists to continue the expert disclosure deadlines in this matter, set forth in the Court's Order granting the parties' stipulated request to modify the case schedule (Dkt. 25) as set forth in the table above. Alternatively, the parties respectfully request that the Court set a further case management conference at which time new dates may be selected.

The parties respectfully request the Court adopt the foregoing stipulated as the order of the Court.

IT IS SO STIPULATED.

Dated: March 10, 2025

DENTONS US LLP

By: /s/ Mordecai Boone
Mordecai Boone

Attorneys for Defendant
NATIONWIDE AGRIBUSINESS INSURANCE
COMPANY

Dated: March 10, 2025

BRIGGS & ALEXANDER, APLC
Jeffrey Weber, Esq.

By: /s/ Jeffrey Weber
Jeffrey Weber

Attorneys for Plaintiffs
NAPA VALLEY LIMONCELLO LLC, d/b/a
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INC., d/b/a NAPASTAK CELLARS

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ORDER

Pursuant to the above-stipulation, and for good cause shown, the Court hereby continues the expert report deadlines set forth in the Court's Order granting the parties' stipulated request to modify the case schedule (Dkt. 25) and the new case schedule is as follows:

<u>Event</u>	<u>Deadline</u>
Exchange of opening expert reports	April 30, 2025
Exchange of rebuttal expert reports	May 28, 2025
Close of fact and expert discovery	June 27, 2025
Dispositive pre-trial motion hearing deadline	August 15, 2025
Pretrial conference:	November 4, 2025
Trial	November 17, 2025

IT IS SO ORDERED.

Dated: 3/11/2025

By 
The Honorable Haywood S Gilliam, Jr.
United States District Judge