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E-Filed 8/13/09

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10 Attorneys for Defendant NATIONWIDE
11 MUTUAL FIRE INSURANCE COMPANY

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14 **MANNION & LOWE**

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20 Attorneys for Plaintiff
21 TAMIKO CARRILLO

22 UNITED STATES DISTRICT COURT OF CALIFORNIA

23 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

24 TAMIKO CARRILLO,

No. C 07-01979 JF

25 Plaintiff,

**STIPULATED REQUEST FOR
ORDER CHANGING TIME;**

26 vs.

~~{PROPOSED}~~ ORDER

[Local Rules 6-2, 7-12]

27 NATIONWIDE MUTUAL FIRE
28 INSURANCE COMPANY, NATIONWIDE
MUTUAL INSURANCE, ALLIED
INSURANCE,

Amended Complaint

Filed: 07/25/07

Trial Date: None Set

Defendants.

[Hon. Jeremy Fogel]

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendant Nationwide Mutual Fire Insurance Company ("Nationwide Fire"), by and
3 through its attorneys of record, Rudloff Wood and Barrows LLP, and Plaintiff Tamiko Carrillo
4 ("Plaintiff"), by and through her attorneys of record, Mannion & Lowe, hereby stipulate:

5 WHEREAS, completing discovery related to Plaintiff's medical providers has been
6 delayed due to the parties' discovery dispute; and

7 WHEREAS, the parties have not been able to resolve the dispute by meeting and
8 conferring and Plaintiff intends to file a motion to quash to be heard on September 29, 2009; and

9 WHEREAS, the non-expert discovery cut-off is presently set for August 21, 2009; and

10 WHEREAS, other court dates are presently set as follows:

- 11 • Completion of ADR: July 31, 2009
- 12 • Expert Disclosures: August 28, 2009
- 13 • Expert Rebuttal: September 8, 2009
- 14 • Complete Expert Discovery: October 6, 2009
- 15 • Dispositive Motions: November 6, 2009

16 WHEREAS, the parties have the following outstanding discovery requests: 1) Nationwide
17 Fire's Deposition of Ms. Barbara Krzyckowska; 2) Nationwide Fire's Deposition of Dr. Bruce
18 Eliashof; 3) Plaintiff's Deposition of Nationwide Fire's Most Knowledgeable Person(s); 4)
19 Nationwide Fire's Deposition of Mannion & Lowe's Person Most Knowledgeable; and 5)
20 Nationwide Fire's Deposition of Winer McKenna's Person Most Knowledgeable; and

21 WHEREAS, the Court issued a ruling on the parties' respective motions for summary
22 judgment on the issues of duty to defend and bad faith on July 2, 2009; and

23 WHEREAS, Plaintiff intends to seek leave to file a supplemental complaint; and

24 WHEREAS, the parties have been unable to coordinate a date for a full-day mediation
25 session in July or August; and

26 WHEREAS, the parties are presently making arrangements to schedule a full day
27 mediation; and

28 WHEREAS, the parties' previous stipulations for order changing time to complete ADR

process and for other extensions of court deadlines were warranted by the circumstances of the case at the time and for good cause; and

WHEREAS, the parties agree to extend the time to complete outstanding non-expert discovery and related court dates by 30 days from the hearing of Plaintiff's Motion to Quash, or 30 days after the Court issues a ruling on the motion to quash, whichever is later.

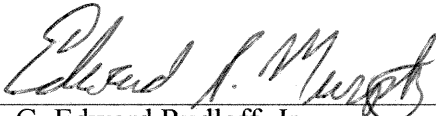
THEREFORE THE PARTIES STIPULATE AS FOLLOWS:

1. The parties agree to extend the court dates indicated below as follows:

- Completion of ADR: October 31, 2009
- Non-expert Discovery: October 29, 2009 (or 30 days after the court rules on Plaintiff's Motion to Quash, whichever is later) as to any discovery properly noticed and/or served prior to August 21, 2009 only
- Expert Disclosures: 3 weeks after non-expert discovery cut-off
- Expert Rebuttal: 2 weeks after expert disclosures
- Complete Expert Discovery: 30 days after expert rebuttal cut-off
- Dispositive Motions: 30 days after expert discovery completion.

DATED: August 12, 2009

RUDLOFF WOOD & BARROWS LLP

By: 
G. Edward Rudloff, Jr.
Edward P. Murphy
Anna A. Chopova

Attorneys for Defendant NATIONWIDE
MUTUAL FIRE INSURANCE COMPANY

DATED: August __, 2009

MANNION & LOWE

By: _____
E. Gerard Mannion
Demian I. Oksenendler

Attorneys for Plaintiff TAMIKO CARRILLO

HAC

process and for other extensions of court deadlines were warranted by the circumstances of the case at the time and for good cause; and

WHEREAS, the parties agree to extend the time to complete outstanding non-expert discovery and related court dates by 30 days from the hearing of Plaintiff's Motion to Quash, or 30 days after the Court issues a ruling on the motion to quash, whichever is later.

THEREFORE THE PARTIES STIPULATE AS FOLLOWS:

1. The parties agree to extend the court dates indicated below as follows:

- Completion of ADR: October 31, 2009
- Non-expert Discovery: October 29, 2009 (or 30 days after the court rules on Plaintiff's Motion to Quash, whichever is later) as to any discovery properly noticed and/or served prior to August 21, 2009 only
- Expert Disclosures: 3 weeks after non-expert discovery cut-off
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G. Edward Rudloff, Jr.
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Attorneys for Defendant NATIONWIDE
MUTUAL FIRE INSURANCE COMPANY

DATED: August 12, 2009

MANNION & LOWE

By: _____

E. Gerard Mannion
Demian I. Oksenendler

Attorneys for Plaintiff TAMIKO CARRILLO


[PROPOSED] ORDER

IT IS SO ORDERED, based on the Stipulation set forth above, and GOOD CAUSE
APPEARING, that:

1. The court dates indicated below are extended as follows:
 - Completion of ADR: October 31, 2009
 - Non-expert Discovery: October 29, 2009 (or 30 days after the court rules on Plaintiff's Motion to Quash, whichever is later) as to any discovery properly noticed and/or served prior to August 21, 2009 only
 - Expert Disclosures: 3 weeks after non-expert discovery cut-off
 - Expert Rebuttal: 2 weeks after expert disclosures
 - Complete Expert Discovery: 30 days after expert rebuttal cut-off
 - Dispositive Motions: 30 days after expert discovery completion.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 8/13/2009



THE HONORABLE JEREMY FOGEL
United States District Court
Northern District of California