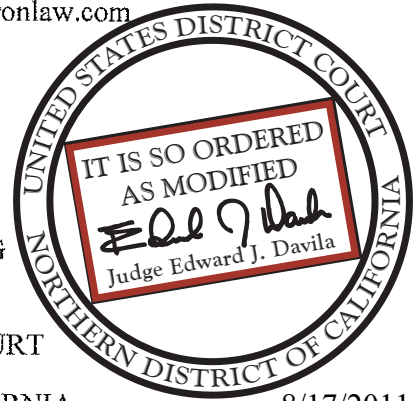


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6 Attorneys for Plaintiff  
PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG



8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

8/17/2011

11 PROBUILDERS SPECIALTY INSURANCE)  
COMPANY, RRG, a District of Columbia, Risk)  
12 Retention Group,

13 Plaintiff,

14 v.

15 VALLEY CORP. B., a California Corporation)  
formerly known as R.J. HAAS CORP.;)  
16 RONALD J. HAAS, an individual; TY LEVINE,  
an individual; KAREN LEVINE, an individual; )  
17 SACHI ADACHI, an individual; TATSUKO  
ADACHI, an individual; and R.J. HAAS )  
18 CONSTRUCTION CORP., a California )  
Corporation,

19 Defendants.  
20

CASE NO.:5:10-cv-05533-EJD

STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING EXPERT  
DISCOVERY-RELATED DEADLINES

21 Plaintiff PROBUILDERS SPECIALTY INSURANCE COMPANY ("ProBuilders"),  
22 Defendant/Counter-Claimants Ronald J. Haas ("Haas"), and Ty and Karen Levine ("Levines")  
23 (collectively "Parties"), by and through their respective attorneys of record, hereby stipulate as  
24 follows:

25 1. On March 9, 2011, the Court issued a Scheduling Order. Pursuant to the Court's  
26 Scheduling Order, the following deadlines are currently set:

27 Expert Disclosure September 16, 2011

28 Rebuttal Expert Disclosure September 30, 2011

1 Last Day for Hearing on  
Objection to Expert Disclosure November 11, 2011

2 Close of Discovery November 18, 2011

3 2. The Parties have worked together in conducting discovery in this matter. However,  
4 due to the large amount of documents, full disclosure of documents in this matter has not been  
5 completed. Once these documents have been produced, the parties will need time to review these  
6 documents, and conduct further discovery, including depositions, as necessary, prior to completing  
7 its expert disclosures.

8 3. The Levines have recently filed a Counterclaim against ProBuilders alleging bad  
9 faith. ProBuilders will need time to conduct discovery regarding the Levines' Counterclaim alleging  
10 bad faith prior to producing its expert disclosure.

11 4. The Parties agree that the expert disclosure and rebuttal expert disclosure deadlines  
12 should be extended 30 days in order to allow the Parties more time to conduct discovery prior to the  
13 expert disclosure and rebuttal expert disclosure deadlines.

14 5. Therefore, the Parties hereby stipulate and agree to the following discovery  
15 deadlines:

16 Expert Disclosure October 16, 2011

17 Rebuttal Expert Disclosure October 30, 2011

18 Last Day for Hearing on  
19 Objection to Expert Disclosure December 12, 2011<sup>1</sup>

20 6. The close of discovery shall remain November 18, 2011.

21 7. The Parties hereto believe that in the interests of judicial economy and the interests  
22 of justice will be bet served by the requested extension of discovery deadlines.

23 8. This Stipulation will not alter the date of any other event or any other deadline already  
24 fixed by Court Order.

25 ///

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26  
27 <sup>1/</sup>This deadline is 43 days after the deadline for Rebuttal Expert Disclosures. A 42 day deadline  
28 (pursuant to the March 9, 2011 Scheduling Order) would require the Motion to be heard on  
December 5, 2011, and noticed on October 31, 2011, one day after the deadline for Rebuttal Expert  
Disclosures.

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YARON & ASSOCIATES

Dated: August 16, 2011

[Signature]

JAMES I. SILVERSTEIN, ESQ.  
HIELAM CHAN, ESQ.  
Attorneys for Plaintiff/Counter-Defendant  
PROBUILDERS SPECIALTY INSURANCE  
COMPANY

HINES SMITH CARDER DINCEL BLAND

Dated: \_\_\_\_\_

\_\_\_\_\_

KIM DINCEL, ESQ.  
JULIE ROGERS, ESQ.  
Attorneys for Defendant/Counter-Claimant  
TY LEVINE AND KAREN LEVINE

GREENAN, PEPPER, SALLANDER &  
LALLY, LLP

Dated: August 12, 2011

Chip Cox

CHIP COX, ESQ.  
Attorney for Defendant/Counter-Claimant  
RONALD J. HAAS

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

Dated: \_\_\_\_\_

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UNITED STATES DISTRICT JUDGE  
EDWARD J. DAVILA

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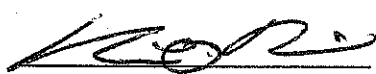
YARON & ASSOCIATES

Dated: \_\_\_\_\_

\_\_\_\_\_  
JAMES I. SILVERSTEIN, ESQ.  
HIELAM CHAN, ESQ.  
Attorneys for Plaintiff/Counter-Defendant  
PROBUILDERS SPECIALTY INSURANCE  
COMPANY

HINES SMITH CARDER DINCEL BLAND

Dated: 8-18-11

  
KIM DINCEL, ESQ.  
JULIE ROGERS, ESQ.  
Attorneys for Defendant/Counter-Claimant  
TY LEVINE AND KAREN LEVINE

GREENAN, PEFFER, SALLANDER &  
LALLY, LLP

Dated: \_\_\_\_\_

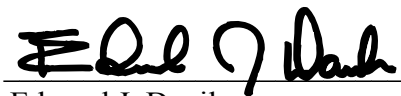
\_\_\_\_\_  
CHIP COX, ESQ.  
Attorney for Defendant/Counter-Claimant  
RONALD J. HAAS

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED AS MODIFIED:**

The Court includes the following deadlines to the parties' proposed scheduling deadlines:

- Last Date for Hearing Dispositive Motions on or before **February 10, 2012 at 9:00 a.m.**
- Preliminary Pretrial Conference on **November 4, 2011 at 11:00 a.m.**
- Joint Pretrial Conference statement due **October 25, 2011.**
- Deadline to file referral to Court's ADR program on or before **August 31, 2011.**

Dated: August 17, 2011

  
Edward J. Davila  
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I am over 18 years of age and not a party to the within action. I am employed in the  
3 County of San Francisco; my business address is **Yaron & Associates, 601 California Street,**  
4 **Suite 2100, San Francisco, California 94108.**

5 On **August 16, 2011**, I served the within:

6 **STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT**  
7 **DISCOVERY-RELATED DEADLINES**

8 **DECLARATION OF JAMES I. SILVERSTEIN IN SUPPORT OF STIPULATION**  
9 **AND [PROPOSED] ORDER EXTENDING EXPERT DISCOVERY-RELATED**  
10 **DEADLINES**

11 on all parties in this action, as addressed below, by causing a true copy thereof to be distributed  
12 as follows:

13 *TO ALL PARTIES ON THE ECF SERVICE LIST*

14 **\* VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically  
15 on designated recipients through PACER. Upon  
16 completion of electronic transmission of said  
17 document(s), a receipt is issued to serving party  
18 acknowledging receipt by PACER's system. Once  
19 PACER has served all designated recipients, proof  
20 of electronic service is returned to the filing party  
21 which will be maintained with the original  
22 document(s) in our office. This service complies  
23 with CCP §101.6.

24 I declare under penalty of perjury under the laws of the State of California that the  
25 foregoing is true and correct, and that this declaration was executed on **August 16, 2011**, at San  
26 Francisco, California.

27   
28 **LYDIA BURTON**  
lburton@yaronlaw.com