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3	ESTEE LEWISCalifornia State Bar No. 268358 CATHLEEN THERESA BARR California State Bar No. 295538		
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5	Redding, California 96099-4390		
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7	Attorneys for Defendants, TATE		
8			
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11			
12	PRAETORIAN INSURANCE COMPANY,	No. 2:13-CV-02639-MCE-EFB	
13			
14	Plaintiffs,	STIPULATION AND ORDER TO EXTEND THE DISCOVERY CUT OFF	
15	VS.	DATE AND EXPERT DISCLOSURE DATE	
16	A R BUSINESS GROUP, INC. dba U S TIRE &	DATE	
17	WHEEL; MARSHAUN TATE; SHAUN TATE by and through his guardian ad litem, KENNETH		
18	TATE; ELISEO QUINTERO, SR.; AIDA	Trial Date: February 26, 2016	
19	QUINTERO; FORD MOTOR COMPANY; BRIDGESTONE AMERICAS, ICN.,		
20	Defendants.		
21			
22	THE PARTIES HERETO, by and through	their respective counsel, stipulate as follows:	
23	1. The discovery cut off date currently set for April 24, 2015 should be extended		
24	until July 20, 2015.		
25			
26	2. The expert witness disclosure date currently set for June 26, 2015 should be		
27	extended until August 14, 2015.		
28			
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1	3. The parties have conducted written	n discovery in this case and are now in the	
2	process of setting numerous dep	ositions. It will be difficult to coordinate	
3	deposition dates in this case since	e there are five law firms involved in this	
4	litigation. The parties agree that a short extension of the discovery cutoff in this		
5			
6	date is needed so that all depositions can occur before discovery closes.		
7	DATED: March 19, 2015	BARR & MUDFORD	
8			
9			
10		/s/ John Douglas Barr JOHN DOUGLAS BARR	
11		Attorney for Defendants TATE	
12			
13	DATED: March 19, 2015	SELVIN, WRAITH, HALMAN LLP	
14			
15		/s/ Robin D. Korte ROBIN D. KORTE	
16		Attorney for Plaintiff, Praetorian	
17		Insurance Company	
18	DATED: March 19, 2015	JAMES J. KAUFMAN, A Professional	
19	DATED. Waten 19, 2015	Corporation	
20			
21		/s/ James J. Kaufman JAMES J. KAUFMAN	
22		Attorney for Defendants AR BUSINESS GROUP, INC., dba US TIRE & WHEEL	
23		OKOUF, INC., dda US TIKE & WHEEL	
24	DATED: March 19, 2015	LARSON, GARRICK & LIGHTFOOT, LLP	
25			
26		/s/ Mary P. Lightfoot ARNOLD D. LARSON	
27		MARY P. LIGHTFOOT	
28		Attorneys for Defendant/Cross-Defendant, BRIDGESTONE AMERICAS, INC.	
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t Street ox 994390	Page 2 Stipulation and [Proposed] Order – Extend D	iscovery and Expert Witness Disclosure	

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1	DATED: March 19, 2015	ROSENTHAL LAW
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3		/s/ S. David Rosenthal S. DAVID ROSENTHAL
4		Attorney for Plaintiffs, ELISEO QUINTERO, And AIDA QUINTERO
5		
6	IT IS SO ORDERED:	
7	The discovery cut off is extended from April 24, 2015 to July 20, 2015, and the expert witness disclosure is extended from June 26, 2015 to August 14, 2015. All other dates set forth in the Court's Pretrial Scheduling Order filed September 11, 2014 remain unchanged. Dated: March 27, 2015	
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10		
11	Dateu. March 27, 2013	1 DER
12	MODDISON	N C. ENGLAND, JR., CHIEF JUDGE
13	UNITED ST	TATES DISTRICT COURT
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Post Office Box 994390 Redding, CA 96099-4390	Stipulation and [Proposed] Order – Exten	d Discovery and Expert Witness Disclosure