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8	Attorneys for Defendant INDIAN HARBOR INSURANCE COMPANY		
9			
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRIC	CT OF CALIFORNIA	
12	IGNACIO PEREZ,	Case No. 4:19-cv-07288-YGR	
13	Plaintiff,	ORDER GRANTING STIPULATION	
14	V.	NO. 4: TO EXTEND EXPERT DISCOVERY DEADLINE TO JULY	
15	INDIAN HARBOR INSURANCE COMPANY, and DOES 1 through 50, inclusive,	19, 2021 TO TAKE ONE DEPOSITION	
16		Judge: Hon. Yvonne Gonzalez Rogers	
17	Defendants.	Complaint Filed: November 5, 2019	
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STIPULATION NO. 4: TO EXTEND EXPERT DISCOVERY DEADLINE TO JULY 19, 2021 TO TAKE ONE DEPOSITION CASE NO. 4:19-cv-07288-YGR

Plaintiff Ignacio Perez ("Plaintiff") and Defendant Indian Harbor Insurance Company ("Defendant") (collectively, the "parties"), by and through their counsel, hereby stipulate as follows:

WHEREAS, on August 31, 2020, the Court set an April 7, 2021 deadline for completion of non-expert discovery, a May 7, 2021 deadline for opening expert reports, a June 7, 2021 deadline for rebuttal expert reports, and a July 9, 2021 deadline for completion of expert discovery (ECF No. 67);

WHEREAS, on April 9, 2021, the Court granted the parties' Stipulation No. 2, which set an April 28, 2021 deadline for the completion of certain depositions, and moved the expert report deadlines by one week to May 14, 2021 (opening reports) and June 14, 2021 (rebuttal reports) (ECF No. 83);

WHEREAS, the parties timely disclosed experts on May 14, 2021 and June 14, 2021, and disclosed a total of seven expert witnesses;

WHEREAS, the parties scheduled five experts for depositions by July 9, 2021 and entered into Stipulation No. 3: To Extend Expert Discovery Deadline by One Week (ordered by the Court on June 24, 2021 (Doc. 95)) to conduct the remaining two depositions by July 16, 2021;

WHEREAS, the expert deposition that was scheduled for June 30, 2021 had to be cancelled because the examining attorney's husband was unexpectedly scheduled for surgery that day; and

WHEREAS, based on the attorneys' and witness' schedule, the first available date on which to conduct that deposition is July 19, 2021, and the parties have agreed to that date for the rescheduled June 30, 2021 deposition.

NOW THEREFORE, the parties respectfully request that the Court continue the deadline for completion of expert discovery from July 9, 2021 to July 19, 2021 for the purposes of conducting the additional (rescheduled) deposition on July 19, 2021. All other remaining deadlines set forth in the Court's August 31, 2020 Case Management and Pretrial Order shall remain the same, and no deadline to lodge or file any matter with the Court shall be changed.

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1	IT IS SO STIPULATED, through Counsel of Record.	
2	Dated: July 6, 2021	DUANE MORRIS LLP
3		By: /s/ Max. H. Stern
4		Max H. Stern
5		Max H. Stern (SBN 154424) Jessica E. La Londe (SBN 235744)
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10		Attorneys for Defendant Indian Harbor Insurance
11		Company
12	Dotad: July 6, 2021	DIIDCOD & FIGHED D A
13	Dated: July 6, 2021	BURSOR & FISHER, P.A.
14		By: <u>/s/ Scott A. Bursor</u> Scott A. Bursor
15		Scott A. Bursor (SBN 276006)
16		701 Brickell Avenue, Suite 1420 Miami, FL 33131
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19		BURSOR & FISHER, P.A.
20		L. Timothy Fisher (SBN 191626) Yeremey O. Krivoshey (SBN 295032)
21 22		Blair E. Reed (SBN 316791) 1990 North California Blvd., Suite 940
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25		ykrivoshey@bursor.com breed@bursor.com
26		Attorneys for Plaintiff
27	///	
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STIPULATION NO. 4: TO EXTEND EXPERT DISCOVERY DEADLINE TO JULY 19, 2021 TO TAKE ONE DEPOSITION CASE NO. 4:19-cv-07288-YGR

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ATTESTATION I, Max H. Stern, am the ECF User whose identification and password are being used to file Stipulation No. 4: To Extend Expert Discovery Deadline to July 19, 2021 to Take One Deposition, filed concurrently herewith. Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiff Ignacio Perez has concurred in the filing of the Stipulation No. 4: To Extend Expert Discovery Deadline to July 19, 2021 to Take One Deposition, filed concurrently herewith. Dated: July 6, 2021 **DUANE MORRIS LLP** /s/ Max H. Stern Max H. Stern IT IS ORDERED that the forgoing Stipulated Order is approved and entered as an Order of the Court. Dated: 7/12/2021