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Attorneys for Plaintiff Stonington
Insurance Company

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

STONINGTON INSURANCE
COMPANY,

Plaintiff,

vs.

ROBERT ADAMS; CREATIVE
FRONTIERS SCHOOL, INC.;
SAUNDRA ADAMS; AO DOE; BR
DOE, BY AND THROUGH HER
GUARDIAN AD LITEM, C DOE; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:16-cv-02577-MCE-DB

**STIPULATION AND ORDER TO
EXTEND TIME FOR EXCHANGE
OF INITIAL DISCLOSURES
PURSUANT TO FRCP 26**

Action File: 10/28/16
Trial Date: None Set

Pursuant to Local Rule 144(a), the parties hereto, Plaintiff Stonington

Insurance Company; Defendants Robert Adams, Sandra Adams, Creative Frontiers
School, Inc. (the “Adams Defendants”); Defendant AO Doe and Defendant BR Doe,
by and through her Guardian Ad Litem C Doe (collectively the “Parties”), submit
the following stipulation and [proposed] order to extend the time for exchanging
Initial Disclosures pursuant to FRCP 26(a)(1)).

4844-0022-6112.1

1 The Parties stipulate that good cause exists to extend the deadline for the
2 Parties' Initial Disclosures based on the pending motion to dismiss or in the
3 alternative, stay this lawsuit (the "Motion to Stay") filed by the Adams Defendants
4 on February 10, 2017 and scheduled for hearing before this Court on February 23,
5 2017. The Parties stipulate to extend the deadline for exchanging their Initial
6 Disclosures to (1) March 2, 2017 or (2) seven (7) days from the date the Court
7 issues its ruling on the Motion for Stay, whichever is later.

8 IT IS SO STIPULATED.

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10 DATED: January 24, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

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12
13 By: /s/

Lane J. Ashley

Jamie L. Vels

JoAnn Rangel

Attorneys for Plaintiff Stonington

Insurance Company

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17 DATED: January 24, 2017

FARMER SMITH & LANE LLP

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19
20 By: /s/

Blane A. Smith, Esq.

Eric Brenneman, Esq.

Farmer Smith & Lane LLP

Attorneys for Defendants

Robert Adams, Sandra Adams, Creative

Frontiers School, Inc.

1 DATED: January 20, 2017

LAW OFFICES OF JOSEPH C. GEORGE,
Ph.D.

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3
4 By: /s/


5 Joseph C. George, Esq.
6 Joseph C. George, Jr., Esq.
7 Attorneys for Defendants
8 AO Doe and BR Doe, by and through her
9 Guardian Ad Litem C Doe

10 **ORDER**

11 PURSUANT TO STIPULATION and based on the existence of good cause,
12 it is hereby ordered that the deadline for the Parties' exchange of their Initial
13 Disclosures (pursuant to FRCP 26(a)(1)) shall be extended to (1) March 2, 2017 or
14 (2) seven (7) days from the date of the Court's ruling on the Motion to Stay,
15 whichever is later.

16 **IT IS SO ORDERED.**

17 Dated: January 25, 2017

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19 MORRISON C. ENGLAND, JR.
20 UNITED STATES DISTRICT JUDGE
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