

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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R.J. Zayed, In his Capacity as Court-Appointed  
Receiver for Trevor G. Cook, et al.

Case No: 0:11-cv-01319-MJD-FLN

Plaintiff,

vs.

**STIPULATION TO EXTEND  
PRETRIAL DEADLINE**

Arch Insurance Company,

Defendant.

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WHEREAS, the Court filed a Pretrial Schedule on September 14, 2011 (Docket No. 17).

WHEREAS, the Pretrial Schedule set the deadline for disclosure of expert witness as follows:

- a. Disclosure of the identity of expert witnesses under Rule 26(a)(2)(A) shall be made as follows:
  - 1) By Plaintiff(s) on or before December 9, 2011.
  - 2) By Defendant(s) on or before January 13, 2012.
- b. Full disclosure of the substance of the testimony to be offered by each expert witness shall be made as follows:
  - 1) By plaintiff(s) on or before December 9, 2011.
  - 2) By defendant(s) on or before January 13, 2012.

WHEREAS, to date, the parties have exchanged discovery requests and responses, and are in the process of producing documents. The parties anticipate taking depositions shortly.

WHEREAS, because of the continuing document productions, the parties have agreed to extend the expert disclosure deadlines in the Pretrial Schedule by 30 days.

WHEREAS, the parties certify and agree that this request for an extension of time is made in good faith, will not prejudice the respective parties, and is not made for the purpose of delay.

THEREFORE, the parties, through undersigned counsel, stipulate and move pursuant to Local Rule 16.3 that the Pretrial Schedule governing this action be amended as follows:

- a. Disclosure of the identity of expert witnesses under Rule 26(a)(2)(A) shall be made as follows:
  - 1) By Plaintiff(s) on or before January 9, 2012.
  - 2) By Defendant(s) on or before February 13, 2012.
- b. Full disclosure of the substance of the testimony to be offered by each expert witness shall be made as follows:
  - 1) By plaintiff(s) on or before January 9, 2012.
  - 2) By defendant(s) on or before February 13, 2012.

All other provisions, dates and deadlines provided in the Pretrial Schedule shall remain the same.

Stipulated to by:

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