

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

KATHLEEN McHUGH and
DEANNA SCHNEIDER, individually
and on behalf of all persons similarly situated,
Plaintiffs,

v.

Case No: 11-cv-724-bbc

MADISON-KIPP CORPORATION,
CONTINENTAL CASUALTY COMPANY,
COLUMBIA CASUALTY COMPANY,
UNITED STATES FIRE INSURANCE
COMPANY and ABC INSURANCE
COMPANIES 1 – 50,

Defendants,

and

MADISON-KIPP CORPORATION,
Cross-Claimant,

v.

CONTINENTAL CASUALTY COMPANY,
COLUMBIA CASUALTY COMPANY, and
UNITED STATES FIRE INSURANCE
COMPANY,

Cross-Claim Defendant,

and

CONTINENTAL CASUALTY COMPANY and
COLUMBIA CASUALTY COMPANY,
Cross-Claimants/Third-Party Plaintiffs,

v.

MADISON-KIPP CORPORATION,
Cross-Claim Defendants,

and

LUMBERMENS MUTUAL CASUALTY
COMPANY, AMERICAN MOTORISTS
INSURANCE COMPANY, and JOHN DOE
INSURANCE COMPANIES 1-20,
Third-Party Defendants.

**SECOND STIPULATION FOR EXTENSION OF TIME TO FILE RULE 26(A)(3)
DISCLOSURES AND MOTIONS IN LIMINE**

IT IS STIPULATED AND AGREED by and between Plaintiffs, Kathleen McHugh and Deanna Schneider, individually and on behalf of all persons similarly situated, Defendant Madison-Kipp Corporation, Defendant Continental Casualty Company, Defendant Columbia Casualty Company and Defendant United States Fire Insurance Company, by and through their counsel, that (1) all parties shall have until July 22, 2013 to file and serve all initial Rule 26(a)(3) disclosures, as well as all motions in limine, proposed voir dire questions, proposed jury instructions, and proposed verdict forms; (2) the responsive filing deadline will be moved to August 2, 2013; (3) the Final Pretrial Conference be rescheduled to either August 8 or August 12, 2013, which ever date works better for the Court; and (4) the current trial date of August 19, 2013 shall remain in place. The parties respectively request that the Court enter a text order in accordance with their stipulation.

The parties file this stipulation in conjunction with their phone call with the Court's chambers on July 3, 2013, and in response to the Court's denial of their initial stipulation to extend final pre-trial deadlines. This stipulation will permit the parties to conserve time and effort and better focus on settlement of all issues in the case. Defendant Madison-Kipp Corporation files this stipulation on behalf of all parties.

Dated this 5th day of July, 2013.

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Madison-Kipp Corporation**

Dated this 5th day of July, 2013.

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