

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIARA YACHTS, INC.,

Case No.1:22-cv-603

Plaintiff/Counter-Defendant,

Honorable Robert J. Jonker

v .

Magistrate Judge Ray Kent

BLUE CROSS BLUE SHIELD OF MICHIGAN,

Defendant/Counter-Plaintiff.

JOINT STIPULATION REGARDING AMENDING DISCOVERY DEADLINES

Plaintiff/Counter-Defendant Tiara Yachts, Inc. (“Tiara Yachts”) and Defendant/Counter-Plaintiff Blue Cross Blue Shield of Michigan (“BCBSM”), by and through their attorneys, stipulate and agree as follows:

1. On August 14, 2025, the Court entered its First Case Management Order in this matter. ECF No. 80, PageID.1296.
2. The First Case Management Order required the following discovery deadlines take place on or before the following dates:

Disclosure of Expert Reports (Rule 26(a)(2)(B))	
Plaintiff:	February 28, 2026
Defendant:	March 31, 2026
Rebuttal Reports:	April 15, 2026
Completion of Discovery	May 31, 2026
Dispositive Motions	June 30, 2026
Second Rule 16 Scheduling Conference:	July 27, 2026
Time:	3:00 P.M.
-Updated Joint Status Report due:	July 20, 2026

ECF No. 80, PageID.1296.

3. The parties are currently engaged in written discovery and the exchange of relevant documents.

4. During the current written discovery phase, it became apparent that the parties have substantial disputes about the scope and relevancy of various records.

5. To that end, the parties are currently in the midst of briefing Tiara Yachts' Motion to Compel Written Discovery (ECF No. 124, 125).

6. Moreover, as stated in the parties' Supplement to Joint Status Report (ECF No. 121), both parties remain committed to engaging in facilitative mediation, but for that process to be productive both parties must have a chance to analyze and assess Tiara Yachts' claims data—which neither side has been able to complete yet.

7. As such, counsel for the parties have agreed that an extension of the above discovery deadlines would be appropriate.

8. In order to streamline this matter and avoid unnecessary motion practice, the parties therefore stipulate to an amendment of the discovery deadlines.

9. In particular, the parties agree and respectfully request the Court amend the First Case Management Order to revise the following discovery deadlines to take place on or before:

Disclosure of Expert Reports (Rule 26(a)(2)(B)) Plaintiff: Defendant: Rebuttal Reports:	June 30, 2026 July 31, 2026 August 28, 2026
Completion of Discovery	September 30, 2026
Dispositive Motions	October 30, 2026
Second Rule 16 Scheduling Conference: Time: -Updated Joint Status Report due:	December 7, 2026 3:00 P.M. November 30, 2026

ADR To Take Place On Or Before:	September 30, 2026
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STIPULATED AND AGREED.

VARNUM LLP

Dated: February 13, 2026

By: /s/ Aaron M. Phelps
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Aaron M. Phelps (P64790)
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Attorneys for Plaintiff/Counter-Defendant

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Dated: February 13, 2026

By: /s/ Daniel Lewis (w/ permission)
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Dated: February 13, 2026

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