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**BAKER, MANOCK & JENSEN, PC**  
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Plaintiff DAIRYAMERICA, INC.

Attorneys for

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

DAIRYAMERICA, INC.,  
  
Plaintiff,  
  
v.  
  
NEW YORK MARINE AND GENERAL  
INSURANCE COMPANY; CRUMP  
INSURANCE SERVICES d.b.a. SOUTHERN  
MARINE & AVIATION UNDERWRITERS;  
ARTHUR J. GALLAGHER & CO.; and  
HARTFORD CASUALTY INSURANCE  
COMPANY; and DOES 1 through 75  
  
Defendants.

Case No.: 1:07-cv-00537-LJO-SMS  
  
**JOINT STIPULATION AND ORDER  
TO CONTINUE EXPERT  
DISCLOSURE DEADLINES AND  
EXPERT DISCOVERY CUTOFF  
SCHEDULING CONFERENCE DATES**  
  
JUDGE: Hon. Sandra M. Snyder  
ACTION FILED: February 16, 2007  
TRIAL DATE: November 16, 2009

WHEREAS, on December 2, 2008, the Court entered an amended Scheduling Conference Order (Document No. 47) setting forth the following deadlines, among others, in this matter:

Expert Disclosure Deadline: April 27, 2009  
Supplemental Expert Disclosure Deadline: May 25, 2009  
Expert Discovery Cutoff: July 22, 2009  
Pre-Trial Motion Filing Deadline: August 11, 2009

1 Pre-Trial Motion Hearing Deadline: September 14, 2009  
2 Settlement Conference: May 20, 2009, 10:00 a.m., Dept. 7  
3 Pre-Trial Conference Date: October 7, 2009, 8:30 a.m., Dept. 4  
4 Jury Trial (5 days est.): November 16, 2009, 9 a.m., Dept. 4

5 WHEREAS, on April 6, 2009, Plaintiff DAIRYAMERICA, INC. (“DairyAmerica”)  
6 filed its Motion for Leave to File Third Amended Complaint (“Motion”) (Document Nos. 57  
7 through 60);

8 WHEREAS, the hearing on DairyAmerica’s Motion is scheduled to be heard on  
9 May 8, 2009 at 9:30 a.m. in Courtroom 7.

10 WHEREAS, Plaintiff and Defendants wish to continue the Expert Disclosure  
11 Deadline, Supplemental Expert Disclosure Deadline, and Expert Discovery Cutoff dates to allow  
12 DairyAmerica’s Motion to be heard and ruled upon in advance of the Expert Disclosure Deadline;

13 Accordingly, pursuant to the Local Rules of the United States District Court for the  
14 Eastern District of California, Rules 6-144 and 83-143, Plaintiff and Defendants, by and through  
15 their respective attorneys of record, STIPULATE AND AGREE that:

16 1. Subject to the Court’s approval, the Expert Disclosure Deadline,  
17 Supplemental Expert Disclosure Deadline, and Expert Discovery Cutoff Dates in this matter are  
18 continued as follows:

19 Expert Disclosure Deadline: May 18, 2009  
20 Supplemental Expert Disclosure Deadline: July 6, 2009  
21 Expert Discovery Cutoff: July 31, 2009

22 2. DairyAmerica and Defendant HARTFORD CASUALTY INSURANCE  
23 COMPANY may disclose on July 6, 2009, additional experts, if any, required as a result of the  
24 Court’s ruling on DairyAmerica’s Motion.

25 All parties that have appeared in this action, have signed below, indicating their  
26 agreement to this stipulation.

27 ///  
28 ///

1 DATED: April 20, 2009

BAKER MANOCK & JENSEN, PC

2 By:  /s/ Sherrie M. Flynn  
3 Charles K. Manock  
4 Sherrie M. Flynn  
5 Attorneys for Plaintiff  
6 DAIRYAMERICA, INC.

7 DATED: April 19, 2009

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER

8 By:  /s/ Michael Bolechowski  
9 Michael Bolechowski  
10 Attorneys for Defendants  
11 NEW YORK MARINE AND GENERAL  
12 INSURANCE COMPANY and  
13 SOUTHERN MARINE & AVIATION  
14 UNDERWRITERS, INC.

15 DATED: April 17, 2009

SNYDER LAW, A PROFESSIONAL  
CORPORATION

16 By:  /s/ Barry Clifford Snyder  
17 Barry Clifford Snyder  
18 Ashley Ann Doris  
19 Attorneys for Defendant  
20 ARTHUR J. GALLAGHER & CO.

21 DATED: April 17, 2009

CANNON & NELMS

22 By:  /s/ Robert W. Nelms  
23 Robert W. Nelms  
24 Attorneys for Defendant  
25 HARTFORD CASUALTY INSURANCE  
26 COMPANY

27 **PURSUANT TO THIS STIPULATION**

28 IT IS SO ORDERED.

**Dated:  April 27, 2009**

**/s/ Sandra M. Snyder**  
UNITED STATES MAGISTRATE JUDGE