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(SPACE BELOW FOR FILING STAMP ONLY)

6 Attorneys for Defendant  
 7 THE RAYMOND CORPORATION

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT

10 URBANO SERQUINA

Case No. 1:08-CV-01741 AWI CSA

11 Plaintiffs,

**STIPULATION TO AMEND  
 SCHEDULING CONFERENCE ORDER,  
 TO CONTINUE TRIAL DATE, AND  
 ORDER THEREON**

12 v.

13 THE RAYMOND CORPORATION, and  
 14 DOES 1 through 20,

**Proposed New Dates:**

15 Defendants.

**Discovery Deadlines:**

**Non-Expert Disclosures: June 4, 2010**

**Expert Disclosures:**

**Plaintiff: June 11, 2010**

**Defendant: June 25, 2010**

**Supp. Expert Disclosures: July 16, 2010**

**Expert Discovery: August 20, 2010**

**Motion Deadlines:**

**Non Dispositive: September 10, 2010**

**Dispositive: October 1, 2010**

**Settlement Conference: August 24, 2010**

**10:30 a.m., Judge Gary S. Austin**

**Pre-Trial Conference: September 30, 2010**

**8:30 a.m., Judge Anthony W. Ishii**

**Trial (Jury: 10 days): November 30, 2010**

**8:30 a.m., Judge Anthony W. Ishii**

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**STIPULATION**

WHEREAS, Plaintiff URBANO SERQUINA and Defendant THE RAYMOND CORPORATION previously submitted a Mandatory Joint Scheduling Conference Report to the Court, and the Court, by Scheduling Conference Order issued January 20, 2009 established a schedule and trial date for the case;

WHEREAS, Plaintiff and Defendant have not completed expert disclosures and expert discovery in the case;

WHEREAS, Plaintiff and Defendant have agreed to extend the schedule set forth in the January 20, 2009 Scheduling Conference Order and continue the trial date as set forth in the (Proposed) Scheduling Order below.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendant, through their respective counsel of record, and they each request that the Court enter an order amending the January 20, 2009 Scheduling Conference Order to adjust the schedule in the case as follows:

1. The non-expert disclosures deadline shall be extended to June 4, 2010.
2. Plaintiff’s expert disclosure deadline shall be extended to June 11, 2010.
3. Defendant’s expert disclosure deadline shall be extended to June 25, 2010.
4. The supplemental expert disclosure deadline shall be extended to July 16, 2010.
5. The deadline for expert discovery shall be extended to August 20, 2010.
6. The non-dispositive motion deadline shall be extended to September 10, 2010.
7. The dispositive motion deadline shall be extended to October 1, 2010.
8. A Settlement Conference shall be held in this case at 10:30 a.m. on August 24, 2010 before the Honorable Gary S. Austin, Magistrate Judge.
9. A Pre-Trial Conference shall be held in this case at 8:30 a.m. on September 30, 2010 before the honorable Anthony W. Ishii, Judge.

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10. The Trial of this matter shall commence at 8:30 a.m. on November 30, 2010 before the honorable Anthony W. Ishii, Judge.

Dated: March 16, 2010

LAW OFFICES OF EDWARD B. CHATOIAN

By: /s/ Edward B. Chatoian (as authorized on March 16, 2010)

Edward B. Chatoian  
Attorney for Plaintiff  
URBANO SERQUINA

Dated: March 25, 2010

McCORMICK, BARSTOW, SHEPPARD WAYTE & CARRUTH LLP

By: /s/ Michael F. Ball

Michael F. Ball  
Attorneys for Defendant  
THE RAYMOND CORPORATION

