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6	Attorneys for Defendant and Cross-Defendant United States of America		
7			
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10	KIRSTIE DUNBAR-KARI, )	1:09-cv-00389-LJO-SKO	
11	Plaintiff, )	STIPULATION EXTENDING	
12	v. )	SCHEDULING DEADLINES AND ORDER THEREON	
13	UNITED STATES OF AMERICA; )		
14	STUART JOHNSTON, dba JOHNSTON ) CONSTRUCTION,		
15	Defendants.		
16			
17	STUART JOHNSTON dba JOHNSTON ) CONSTRUCTION,		
18 19	Cross-Complainant, )		
20	v. )		
21	UNITED STATES OF AMERICA and ( ) ROES 1 to 50,		
22	Cross-Defendants.		
23			
24	Plaintiff Kirstie Dunbar-Kari ("Plaintiff"), Defendant and Cross-Defendant United States		
25	of America ("United States") and Defendant and Cross-Complainant Stuart Johnston dba		
26	Johnston Construction ("Johnston") (collectively "the parties") stipulate, by and through the		
27	undersigned counsel, to stipulate to continue the following deadlines in this action as specifically		
28	set forth below.		
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STIPULATION EXTENDING SCHEDULING DEADLINES AND ORDER THEREON

The parties base this stipulation on good cause as the parties have attempted to finish non-expert discovery and all depositions have been noticed. Due to the number of depositions to be taken as well as the location of those depositions, the non-expert discovery date currently set cannot be met. The parties agree to extend certain scheduling deadlines without affecting the pre-trial conference or trial date in this action.

	Old Date	New Date
Non-expert discovery cut-off	06/25/10	08/06/10
Expert disclosures	07/23/10	08/23/10
Supplemental expert disclosures	08/24/10	09/13/10
Expert discovery cut-off	09/24/10	10/08/10
Non-dispositive motion filing deadline	10/01/10	10/15/10
Dispositive motion filing deadline	10/22/10	10/29/10

For the reasons set forth herein, the parties therefore stipulate and agree to extend the foregoing deadlines as specified above. The parties request the court endorse this stipulation by way of formal order.

Dated: June 17, 2010 BENJAMIN B. WAGNER

Acting United States Attorney

/s/ Alyson A. Berg ALYSON A. BERG Attorneys for Defendant and Cross-Defendant United States of America

Respectfully submitted,

McCormick, Barstow, Sheppard Wayte & Carruth LLP

(As authorized 6/17/10) Dated: June 17, 2010 /s/Wade M. Hansard WADE M. HANSARD Attorneys for Plaintiff

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1	Jacobson, Hansen, Najarian & McQuillan	
2	(As authorized 6/17/10)	
3	Dated: June 17, 2010  /s/Leith B. Hansen LEITH B. HANSEN	
4	Attorneys for Defendant and Cross-Complainant	
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6	ORDER	
7	IT IS SO ORDERED.	
8	Dated: June 22, 2010 /s/ Dennis L. Beck UNITED STATES MAGISTRATE JUDGE	
9	UNITED STATES MAGISTRATE JUDGE	
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	STIPULATION EXTENDING SCHEDULING DEADLINES AND ORDER THEREON	