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19 Attorneys for Defendant DELANO FARMS COMPANY

20 **UNITED STATES DISTRICT COURT**  
21 **EASTERN DISTRICT OF CALIFORNIA**

22 SABAS ARREDONDO, JOSE CUEVAS,  
23 HILARIO GOMEZ, IRMA LANDEROS,  
24 and ROSALBA LANDEROS individually,  
25 and on behalf of all others similarly situated,

26 Plaintiffs,

27 v.

28 DELANO FARMS COMPANY, a  
Washington State Corporation; CAL-  
PACIFIC FARM MANAGEMENT, L.P.;  
T&R BANGI'S AGRICULTURAL  
SERVICES, INC., and DOES 1 through 10,  
inclusive,

Defendants.

Case No. 1:09-cv-01247 MJS

**STIPULATION BETWEEN THE  
PARTIES CONCERNING  
CLARIFICATION OF THE COURT'S  
MARCH 21, 2014 ORDER AND ORDER  
THEREON**

**STIPULATION**

The Plaintiffs Sabas Arredondo, Jose Cuevas, Hilario Gomez, Irma Landeros, and Rosalba Landeros and Defendants Delano Farms Company, a Washington State Corporation; Cal-Pacific Farm Management, L.P., and T&R Bangi's Agricultural Services, Inc., by and through their respective counsel of record, hereby stipulate and agree as follows:

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1 The Court entered an order dated March 21, 2014 after the scheduling conference. (Dkt.  
2 315.) The Order currently provides that the Court orders the parties to “engage and designate  
3 experts to assist with formulation of discovery and trial plan by April 4, 2014.” (See Dkt. 315.)  
4 The parties execute this stipulation and propose the below order to the Court to provide that the  
5 parties will engage their experts by April 4, 2014 to assist in the formulation of discovery and a  
6 trial plan, but not formally designate experts in any manner. The parties anticipate that the  
7 designation of experts will occur at a date subsequently set by the Court.

8 The parties respectfully request that the Court enter the Order as set forth below.

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10 **SAVITT BRUCE & WILLEY LLP**

**GRISWOLD, LASALLE, COBB, DOWD & GIN, LLP**

11 By /s/ Miles A. Yanick  
12 David N. Bruce, *Pro Hac Vice*  
13 Miles A. Yanick, *Pro Hac Vice*  
14 Attorneys for Defendant, Delano Farms  
Company

By /s/ Michael R. Johnson  
Michael R. Johnson  
Attorneys for Defendants, Cal-Pacific Farm  
Management, L.P., and T&R Bangi’s Agricultural  
Services, Inc.

15 **LAW OFFICES OF WILLIAM C. HAHESY**

**MYERS, WIDDERS, GIBSON, JONES & FEINGOLD,  
LLP**

16  
17 By /s/ William C. Hahey  
18 William C. Hahey  
19 Attorneys for Defendant, Delano Farms  
Company

By /s/ James E. Perero  
James E. Perero  
Attorneys for Plaintiffs Sabas Arredondo, *et al.*

20 **ORDER**

21 The Court having reviewed the foregoing stipulation and good cause appearing therefor:

22 **IT IS HEREBY ORDERED** that the parties shall engage experts to assist with the  
23 formulation of discovery and trial plan by April 4, 2014. Any formal designation of experts  
24 shall occur at a date to be set later by the Court.

25 **IT IS SO ORDERED.**

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27 Dated: April 1, 2014

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE

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