

PEEL BRIMLEY LLP  
3333 E. SERENE AVENUE, STE. 200  
HENDERSON, NEVADA 89074  
(702) 990-7272 ♦ FAX (702) 990-7273

1 ERIC B. ZIMBELMAN  
2 Admitted *Pro Hac Vice*  
3 STEVEN D. MEACHAM, ESQ.  
4 California Bar No. 169977  
5 **PEEL BRIMLEY LLP**  
6 3333 E. Serene Avenue, Suite 200  
7 Henderson, NV 89074-6571  
8 Phone: (702) 990-7272  
9 *Attorneys for Plaintiff United States*  
10 *for the Use and Benefit of J&J Enterprises, Inc..*

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10 FRESNO DIVISION

11 UNITED STATES FOR THE USE AND  
12 BENEFIT OF J&J ENTERPRISES SERVICES,  
13 INC., a Nevada Corporation,

14 Plaintiff,

15 v.

16 EAGLE PEAK ROCK & PAVING, INC., a  
17 California Corporation, and TRAVELERS  
18 CASUALTY AND SURETY COMPANY OF  
19 AMERICA, a Connecticut Corporation

20 Defendants.

Case No.: 1:11 CV 00643 AWI-DLB

STIPULATION AND ORDER TO  
EXTEND EXPERT DISCLOSURE  
DEADLINE

Dennis L. Beck  
U.S. Magistrate Judge

19 For good cause, the Parties hereby Stipulate and agree that the Court's Scheduling Order  
20 [Document No. 17] may and should be amended to extend the deadline for the written  
21 designation of retained and non-retained experts from February 17, 2012 to March 31, 2012.  
22 Plaintiff needs additional time to complete these disclosures and the Defendants may supplement  
23 their disclosures. The discovery cutoff is June 1, 2012 and the trial date is October 30, 2012.  
24 The parties do not seek to change these dates.

25 In accordance with the provisions of the Scheduling Order, a Declaration of Plaintiff's  
26 counsel, Eric Zimbelman, is submitted herewith in support of this Stipulation.  
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1 RESPECTFULLY SUBMITTED: March 1, 2012.

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3 **PEEL BRIMLEY LLP**

**LAW OFFICES OF MICHAEL W. JANSEN**

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5 \_\_\_\_\_ /s/  
6 ERIC B. ZIMBELMAN, *Pro Hac Vice*

\_\_\_\_\_ /s/  
MICHAEL W. JANSEN

7 *Attorneys for Plaintiff United States*  
8 *for the Use and Benefit of J&J Enterprises*  
9 *Services, Inc.*

Attorney for Defendant Eagle  
Peak Rock & Paving, Inc.  
*(Electronic Signature Authorized via Email*  
*to Plaintiff's counsel*

10 IT IS SO ORDERED.

11 Dated: March 6, 2012

/s/ Dennis L. Beck  
UNITED STATES MAGISTRATE JUDGE

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