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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 DISCOVERY CUTOFF

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 to complete discovery  
21 from June 1, 2012 to July 13, 2012. Because of counsel's scheduling conflicts and witness  
22 availability issues, the Parties need additional time to complete depositions, including expert  
23 depositions, of witnesses in California, Nevada and Colorado. Trial is set for October 30, 2012.  
24 The parties do not seek to change the trial date.

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: May 8, 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: May 10, 2012

/s/ Dennis L. Beck  
UNITED STATES MAGISTRATE JUDGE

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