D. GREG DURBIN (State Bar No. 81749) greg.durbin@mccormickbarstow.com DANIEL S. CHO (State Bar No. 260902) daniel.cho@mccormickbarstow.com McCORMICK BARSTOW L.L.P. 5 River Park Place East Fresno, California 93720 Telephone: 559.433.1300 Facsimile: 559.433.2300

TIMOTHY S. DURST (*admitted pro hac vice*) tim.durst@bakerbotts.com RYAN L. BANGERT (*admitted pro hac vice*) ryan.bangert@bakerbotts.com NICOLE M. GORDON (*admitted pro hac vice*) nicole.gordon@bakerbotts.com 2001 Ross Avenue, Suite 600 Dallas, Texas 75201 Telephone: 214.953.6500 Facsimile: 214.953.6501

Counsel for Defendants IVANHOE ENERGY INC., IVANHOE ENERGY INTERNATIONAL VENTURES INC., IVANHOE ENERGY (LATIN AMERICA) INC., IVANHOE ENERGY LATIN AMERICA INC., and IVANHOE ENERGY ECUADOR INC. Additional Parties Listed on the Signature Page

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

GAR ENERGY AND ASSOCIATES, INC.; GONZALO A. RUIZ, AS A SUCCESSOR IN INTEREST TO AND ASSIGNEE OF GAR ENERGY AND ASSOCIATES, INC.; and JANIS S. RUIZ, AS A SUCCESSOR IN INTEREST TO AND ASSIGNEE OF GAR ENERGY AND ASSOCIATES, INC.,

Plaintiffs,

v.

IVANHOE ENERGY INC., IVANHOE ENERGY INTERNATIONAL VENTURES INC., IVANHOE ENERGY (LATIN AMERICA) INC., IVANHOE ENERGY LATIN AMERICA INC., and IVANHOE ENERGY ECUADOR INC., and DOES 1 through 10, inclusive,

Defendants.

Case No. 1:11-CV-00907-OWW-SMS

STIPULATED REQUEST AND ORDER TO SET EARLY BRIEFING DEADLINES

Hearing Date: September 19, 2011 Time: 10:00 A.M. Courtroom: 3 Pursuant to Local Rules 143-144, Plaintiffs GAR Energy and Associates, Inc., Gonzalo A. Ruiz, as a successor in interest to and assignee of GAR Energy and Associates, Inc., and Janis S. Ruiz, as a successor in interest to and assignee of GAR Energy and Associates, Inc. ("Plaintiffs") and Defendants Ivanhoe Energy Inc., Ivanhoe Energy International Ventures, Inc., Ivanhoe Energy (Latin America) Inc., Ivanhoe Energy Latin America Inc., and Ivanhoe Energy Ecuador Inc. ("Defendants") submit this stipulation and request an order setting early briefing deadlines for responses and replies to Plaintiffs' Motion to Remand (ECF No. 33) and the Motion to Dismiss filed by some of the Defendants (ECF No. 34). The stipulated dates will require the parties to file their response and reply briefs before the deadlines as calculated under the Local Rules, but will not alter the hearing setting. Both motions are set for hearing on September 19, 2011.

Counsel for Plaintiffs and counsel for Defendants have conferred and agreed to request that the briefing deadlines be set as follows:

a. Defendants' Response to Plaintiffs' Motion to Remand and Plaintiffs' Response to the Motion to Dismiss filed by some of the Defendants are due on August 17, 2011; and

b. Plaintiffs' Reply to Defendants' Response to Plaintiffs' Motion to Remand and Defendants' Reply to Plaintiffs' Response to the Motion to Dismiss are due on September 8, 2011.

The parties respectfully request that the Court set the response and reply briefing deadlines for August 17, 2011 and September 8, 2011, respectively.

<u>ORDER</u>

Now before the Court is the parties' Stipulated Request to Set Early Briefing Deadlines. Having considered the stipulation, the Court APPROVES the stipulation and ORDERS that the response briefs to the Plaintiffs' Motion to Remand (ECF No. 33) and the Motion to Dismiss (ECF No. 34) are due on August 17, 2011 and the reply briefs are due on September 8, 2011. IT IS SO ORDERED.

Dated: August 12, 2011

/s/ Oliver W. Wanger UNITED STATES DISTRICT JUDGE