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10 **Attorneys for Zhonglin Co., LLC**

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**  
13 **FRESNO DIVISION**

14 CALIFORNIA CONSORTIUM FOR )  
15 AGRICULTURAL EXPORT, LLC, a )  
16 California Limited Liability Company, )

17 Plaintiff, )

18 vs. )

19 ZHONGLIN CO., LLC a California Limited )  
20 Liability Company; and DOES 1 through 20, )  
21 inclusive, )

22 Defendants. )

) Case No. 1:13-CV-00441-LJO-MJS

) Assigned to: Hon. Lawrence J. O’Neill

) **STIPULATION AND ORDER TO PERMIT**  
) **FILING OF AMENDED**  
) **COUNTERCLAIM AND TO EXTEND**  
) **DEADLINES AND DATES**

23 IT IS HEREBY STIPULATED between the parties that Defendant-Counterclaimant  
24 may file its First Amended Answer and Counterclaims on or before March 31, 2014.

25 IT IS FURTHER STIPULATED between the parties that the following deadlines  
26 extended sixty (60) days:

- 27 1. non-expert discovery deadline: from March 14, 2014, to **May 30, 2014,**
- 28 2. expert disclosure deadline: from March 27, 2014, to **May 26, 2014,**
3. rebuttal expert disclosure deadline: from April 10, 2014, to **June 9, 2014,**
4. expert discovery deadline: from April 25, 2014, to **June 24, 2014,**
5. non-dispositive motion deadline: from April 3, 2014, to **June 2, 2014,**

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6. dispositive motion deadline: from April 3, 2014, to **June 30, 2014**,

IT IS FURTHER STIPULATED between the parties that the following dates be extended:

- 1. dispositive motion hearing: from May 13, 2014, at 8:30 a.m., to **August 15, 2014, at 8:30 a.m.**, Courtroom 4,
- 2. pretrial conference: from June 26, 2014, at 8:30 a.m., to **October 21, 2014, at 8:30 a.m.**, Courtroom 4, and
- 3. jury trial: from September 9, 2014, at 8:30 a.m., to **December 9, 2014, at 8:30 a.m.**, Courtroom 4.

Dated: April 22, 2014

SIDLEY AUSTIN LLP

By: /s/ Thomas P. Hanrahan  
Thomas P. Hanrahan  
Attorneys for Defendant  
Zhonglin Co., LLC

MOTSCHIEDLER, MICHAELIDES,  
WISHON, BREWER & RYAN, LLP

By: /s/ Russell K. Ryan  
Russell K. Ryan,  
Attorneys for Plaintiff California  
Consortium for Agricultural Export, LLC

**ORDER**

Good cause appearing, the above Stipulation is accepted, adopted and made the Order of this Court.

IT IS SO ORDERED.

Dated: April 22, 2014

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE

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