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10 Attorneys for Plaintiff
 11 AMERIPRIDE SERVICES INC.

12 **UNITED STATES DISTRICT COURT**
 13 **EASTERN DISTRICT OF CALIFORNIA**
 14

15 AMERIPRIDE SERVICES INC., a Delaware
 16 corporation,

17 Plaintiff,

18 vs.

19 VALLEY INDUSTRIAL SERVICES, INC., a
 20 former California corporation and TEXAS
 EASTERN OVERSEAS, INC., a former
 21 Delaware Corporation,

22 Defendants.

Case No. CIV. S-00-113 LKK/JFM

**JOINT STIPULATION AND ORDER
 CONTINUING THE HEARINGS ON
 DEFENDANT TEXAS EASTERN
 OVERSEAS, INC.'S DAUBERT
 MOTION TO EXCLUDE OPINION
 TESTIMONY OF PLAINTIFF'S
 EXPERT; MOTION TO RE-OPEN
 DISCOVERY; AND MOTION FOR
 SANCTIONS AGAINST AMERIPRIDE
 SERVICES INC.**

Date: June 20, 2011
 Time: 10:00 a.m.
 Dept.: 4

Hon. Lawrence K. Karlton

Trial Date: January 18, 2012
 Discovery Cut Off: May 1, 2011
 Motion Cut Off: July 1, 2011

24 AND CONSOLIDATED ACTION AND
 25 CROSS AND COUNTER-CLAIMS.
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1 The parties to the above-entitled action, by and through their respective counsel, hereby
2 stipulate and request the Court to continue the hearings on Defendant Texas Eastern Overseas,
3 Inc.'s ("TEO") Notice of Daubert Motion to Exclude Opinion Testimony of Plaintiff's Expert (Dkt.
4 740); Notice of Motion to Re-Open Discovery (Dkt. 736); and Notice of Motion for Sanctions
5 Against AmeriPride Services Inc. (Dkt. 745) and the associated briefing schedule.

6 On May 23, 2011, TEO filed its Daubert Motion to Exclude Opinion Testimony of Plaintiff's
7 Expert; Motion to Re-Open Discovery; and Motion for Sanctions Against AmeriPride Services Inc.
8 The hearings on these motions are currently set for June 20, 2011. Counsel for AmeriPride Services
9 Inc. ("AmeriPride") are unavailable on June 20 due to pre-existing commitments: Mr. Hunsucker
10 will be out of the country, Mr. Zagon will be outside of the Continental United States and Ms.
11 Hodson will be on maternity leave.

12 Counsel for TEO has agreed to move the hearing date and the parties have agreed on a
13 briefing schedule, subject to the Court's approval.

14 Based on the foregoing, IT IS HEREBY STIPULATED by and between the parties as
15 follows:

16 The hearings on Defendant TEO's Daubert Motion to Exclude Opinion Testimony of
17 Plaintiff's Expert; Motion to Re-Open Discovery; and Motion for Sanctions Against AmeriPride
18 Services Inc. will be continued to July 18, 2011.

19 AmeriPride's oppositions to all of the motions shall be due on or before June 20, 2011.

20 TEO's reply briefs in support of all of the motions shall be due on or before July 11, 2011.

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1 Dated: May 27, 2011

HUNSUCKER GOODSTEIN & NELSON PC

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3 By: /s/ Brian L. Zagon
Philip C. Hunsucker
4 Brian L. Zagon
Maureen B. Hodson
5 Attorneys for
AMERIPRIDE SERVICES INC.

6
7 STOEL RIVES LLP
Lee N. Smith
8 Attorneys for
AMERIPRIDE SERVICES INC.

9
10 Dated: May 27, 2011


BASSI, EDLIN, HUIE & BLUM LLP

11
12 By: /s/ Fred M. Blum
Fred M. Blum
13 Antonia O. Garcia, Jr.
Attorneys for
14 TEXAS EASTERN OVERSEAS, INC.

15 WILSON ELSER MOSKOWITZ, EDELMAN &
16 DICKER LLP
Ronald S. Bushner
17 Bernard Gehlhar
Emily M. Weissenberger
18 Attorneys for
19 TEXAS EASTERN OVERSEAS, INC.

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21 IT IS SO ORDERED.

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23 Dated: June 1, 2011

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26 LAWRENCE K. KARLTON
27 SENIOR JUDGE
28 UNITED STATES DISTRICT COURT