

1 William A. Kershaw, SBN 057486  
 Lyle W. Cook, SBN 148914  
 2 Stuart C. Talley, SBN 180374  
 KERSHAW, CUTTER & RATINOFF, LLP  
 3 401 Watt Avenue  
 Sacramento, CA 95864  
 4 Telephone: 916-448-9800  
 Facsimile: 916-669-4499

5 James P. Ulwick (Admitted *Pro Hac Vice*)  
 6 Jean E. Lewis, State Bar No. 148717  
 KRAMON & GRAHAM, P.A.  
 7 One South Street, Suite 2600  
 Baltimore, Maryland 21202  
 8 Telephone: (410) 752-6030  
 Facsimile: (410) 539-1269

9 *Attorneys for Plaintiffs*

10  
 11 NORMAN C. HILE, SBN 57299  
 nhile@orrick.com  
 12 JULIE A. TOTTEN, SBN166470  
 jatotten@orrick.com  
 13 ANDREA L. BROWN, SBN 237629  
 abrown@orrick.com  
 14 ORRICK, HERRINGTON & SUTCLIFFE LLP  
 400 Capitol Mall, Suite 3000  
 15 Sacramento, California 95814-4497  
 Telephone: (916) 447-9200  
 16 Facsimile: (916) 329-4900

17 *Attorneys for Defendant*  
 PRICEWATERHOUSECOOPERS LLP

DANIEL J. THOMASCH  
 (Admitted *Pro Hac Vice*)  
 dthomasch@gibsondunn.com  
 LAUREN J. ELLIOT  
 (Admitted *Pro HacVice*)  
 lelliot@gibsondunn.com  
 GIBSON DUNN & CRUTCHER LLP  
 200 Park Avenue  
 New York, New York 10166-0193  
 Telephone: (212) 351-4000  
 Facsimile: (212) 351-4035

JULIAN W. POON, SBN 219843  
 jpoon@gibsondunn.com  
 ALEXANDER K. MIRCHEFF, SBN 245074  
 amircheff@gibsondunn.com  
 GIBSON, DUNN & CRUTCHER LLP  
 333 South Grand Avenue  
 Los Angeles, California 90071-3197  
 Telephone: (213) 229-7000  
 Facsimile: (213) 229-7520

MICHELE L. MARYOTT, SBN 191993  
 mmaryott@gibsondunn.com  
 GIBSON, DUNN & CRUTCHER LLP  
 3161 Michelson Drive  
 Irvine, California 92612-4412  
 Telephone: (949) 451-3800  
 Facsimile: (949) 451-4220

*Attorneys for Defendant*  
 PRICEWATERHOUSECOOPERS LLP

19 UNITED STATES DISTRICT COURT  
 20 EASTERN DISTRICT OF CALIFORNIA

22 JASON CAMPBELL, et al.,  
 23 Plaintiffs,  
 24 v.  
 25 PRICEWATERHOUSECOOPERS, LLP, a  
 Limited Liability Partnership, and DOES 1-  
 26 100, inclusive,  
 27 Defendant.

Case No. 06-CV-02376 TLN AC

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 COMPLETION OF EXPERT WITNESS  
 DISCOVERY AND AMEND DAUBERT  
 MOTION BRIEFING SCHEDULE**

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Plaintiffs Jason Campbell and Sarah Sobek (“Plaintiffs”) and Defendant PricewaterhouseCoopers LLP (“Defendant”) hereby stipulate and respectfully request that the Court extend the deadline for completion of expert witness discovery and amend the *Daubert* motion briefing schedule, based on the following facts and circumstances:

WHEREAS on May 6, 2014, the Court so ordered the Stipulation and [Proposed] Order Re: Trial Schedule (see Dkt. 601), which set August 15, 2014 as the deadline for the completion of expert witness discovery; September 5, 2014 as the deadline for filing *Daubert* motions; September 26, 2014 as the deadline for filing *Daubert* oppositions; and October 10, 2014 as the deadline for filing *Daubert* replies;

WHEREAS counsel for the parties have been actively working with each other and with Plaintiffs’ expert witness, Lynn Turner, to schedule Mr. Turner’s deposition;

WHEREAS, despite the efforts of the parties, there have been difficulties scheduling the deposition of Plaintiffs’ expert witness due to circumstances beyond the parties’ control;

WHEREAS the parties agree that a brief extension of the expert discovery deadline and an amendment to the *Daubert* briefing schedule will allow the parties to timely complete expert depositions and fully brief the *Daubert* motions without otherwise affecting the trial schedule;

WHEREAS the parties agree that all other deadlines set by the Court in its May 6, 2014, trial schedule order shall remain in effect.

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2 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendant,  
3 by and through their respective undersigned counsel, that the following schedule shall be adopted:  
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EVENT/FILING	DATE
Completion of expert witness discovery	September 8, 2014
<i>Daubert</i> motion	September 15, 2014
<i>Daubert</i> opposition	October 1, 2014

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10 All other dates set by the Court in its May 6, 2014 scheduling order shall remain in effect.

11 Dated: September 3, 2014

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13 DANIEL J. THOMASCH  
14 LAUREN J. ELLIOT  
15 MICHELE MARYOTT  
16 JULIAN POON  
17 Gibson Dunn & Crutcher LLP

18 NORMAN C. HILE  
19 JULIE A. TOTTEN  
20 ANDREA L. BROWN  
21 Orrick, Herrington & Sutcliffe LLP

22 By:           /s/ Daniel J. Thomasch            
23 DANIEL J. THOMASCH  
24 Attorneys for Defendant  
25 PRICEWATERHOUSECOOPERS LLP

26 Dated: September 3, 2014

27 KERSHAW, CUTTER & RATINOFF, LLP

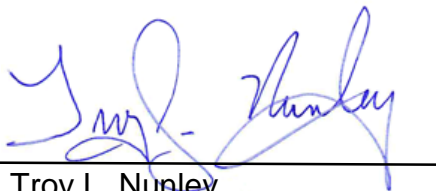
28 By:           /s/ William A. Kershaw\*\*            
WILLIAM A. KERSHAW  
Attorneys for Plaintiffs

\*\*As authorized on September 3, 2014.

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**IT IS SO ORDERED.**

Dated: September 8, 2014



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Troy L. Nunley  
United States District Judge