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11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA

13
 14 OLD REPUBLIC INSURANCE
 COMPANY,
 15 Plaintiff,
 16 v.
 17 TURBOMECA S.A. and TURBOMECA
 USA,
 18 Defendants.

Case No. 2:07:CV-1398 WBS DAD
 [Consolidated Master Case Number]

STIPULATION AND ORDER REGARDING
 EXTENSION OF TIME FOR RULE 26(F)
 CONFERENCE, TO SERVE INITIAL
 DISCLOSURES, AND TO CONTINUE
 INITIAL (PRETRIAL SCHEDULING)
 CONFERENCE

19 COUNTY OF SACRAMENTO,
 Plaintiff,
 20 v.
 21 TURBOMECA S.A., a French
 Corporation; LA SOCIETE ANONYME
 22 TURBOMECA FRANCE, a French
 Corporation; TURBOMECA USA, a Texas
 23 Corporation; TURBOMECA ENGINE
 CORPORATION, a Texas Corporation,
 24 and Does 1 through 50,
 25 Defendants.

26 Plaintiff County of Sacramento and Defendants Turbomeca S.A. (f/k/a La Societe
 27 Anonyme Turbomeca France) and Turbomeca USA, Inc. (f/k/a Turbomeca Engine Corporation)

28 STIPULATION AND ORDER
 REGARDING EXTENSION OF TIME
 24839-0159/LEGAL16553620.1

1 hereby stipulate and seek an order of the Court extending certain deadlines in the above-entitled
2 matter, and state as follows:

3 These consolidated actions arise from the crash of a Sacramento County Sheriff's
4 Department helicopter on July 13, 2005, which resulted in the deaths of two Sheriff's deputies,
5 injuries to a third deputy, and the loss of the helicopter. The County of Sacramento commenced
6 the action numbered 2:07-cv-01398-WBS-DAD on July 13, 2007. Old Republic Insurance
7 Company commenced the action numbered 2:08-cv-01376-WBS-DAD on June 18, 2008. The
8 damages sought by plaintiffs include property loss, reimbursement of insurance payments for the
9 helicopter, reimbursement of workers' compensation payments made to, or on behalf of, the
10 occupants of the helicopter, and loss of use. The helicopter occupants and their families
11 commenced a separate personal injury action against Turbomeca S.A. and Turbomeca USA, but
12 the parties to that action reached a settlement and the case has been dismissed.¹

13 On August 7, 2008, the Court ordered the actions consolidated under master case number
14 07-CV-01398-WBS-DAD. The court also adopted the scheduling order from the Old Republic
15 action, which set a status conference for December 1, 2008, at 2:00 p.m. On November 17, 2008,
16 the Court continued this conference to April 6, 2009. (Docket No. 43.) On March 19, 2009, the
17 Court continued this conference to September 8, 2009. (Docket No. 47.)

18 The defendants have filed their answers in these consolidated actions and the parties have
19 been working diligently to resolve the case informally and without burden on the Court. Counsel
20 for Old Republic and Turbomeca met in person in June 2009 and settled the claims brought by
21 Old Republic. (Notice of Settlement, Docket No. 48.) Counsel for Turbomeca and the County
22 have met in person to discuss resolution of the case and are scheduling additional meetings in
23 person, which will likely occur in August or September 2009. The parties have also been in the
24 process of informally exchanging documents and information and have exchanged and are
25 reviewing numerous documents. The parties mutually desire to avoid unnecessary litigation and
26 expense, and to facilitate an early and cost-effective resolution of these consolidated cases.

27
28 ¹ *Eric Henrikson, et al. v. Turbomeca, S.A., et al.*, Case No. 2:06-cv-01563-WBS-DAD (filed July 13, 2006,
terminated June 26, 2008).

1 The parties respectfully submit, by this Stipulation, their joint request that all currently
2 scheduled matters in this action be continued for a period of four months, so that the parties can
3 continue the informal exchange of information and documents and work toward an informal
4 resolution of the cases without incurring unnecessary expenses and without imposing any
5 unnecessary burdens on the Court.

6 Accordingly, the parties hereby STIPULATE AND AGREE to submit their joint request
7 that the Court order as follows:

8 1) That the deadline for completion of the Rule 26(f) conference of the parties is
9 extended a date no later than November 6, 2009;

10 2) That the deadline for the exchange of initial disclosures is extended to December
11 4, 2009; and

12 3) That the initial scheduling conference currently set for September 8, 2009 is
13 continued to a date no earlier than December 18, 2009.

14 DATED: July 17, 2009

PERKINS COIE LLP

15
16 By: /s/Brendan Murphy
Brendan Murphy

17 Attorneys for Defendants
18 Turbomeca S.A. and Turbomeca USA, Inc.

19 DATED: July 17, 2009

**LENAHAN, LEE
SLATER & PEARSE, LLP**

21 By: /s/Kathleen Staker per email approval
22 Charleton S. Pearse
Kathleen Staker

23 Attorneys for Plaintiff
24 County of Sacramento

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ORDER

IT IS HEREBY ORDERED THAT:

- (1) The Initial Conference of the Parties pursuant to Federal Rule of Civil Procedure 26(f) shall occur no later than November 6, 2009;
- (2) The Initial Disclosures of the parties pursuant to Federal Rule of Civil Procedure 26(a)(1) shall occur no later than December 4, 2009; and
- (3) The Status (Initial Scheduling) Conference currently scheduled for September 8, 2009 is vacated and rescheduled for **December 14**, 2009, at 2pm.

DATED: July 17, 2009



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE