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

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

COUNTY OF SACRAMENTO,
Plaintiff,
v.
TURBOMECA S.A., a French
Corporation; LA SOCIETE ANONYME
TURBOMECA FRANCE, a French
Corporation; TURBOMECA USA, a Texas
Corporation; TURBOMECA ENGINE
CORPORATION, a Texas Corporation,
Defendants.

Case No. 2:07:CV-1398 WBS DAD

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

Plaintiff County of Sacramento and Defendants Turbomeca S.A. (f/k/a La Societe Anonyme Turbomeca France) and Turbomeca USA, Inc. (f/k/a Turbomeca Engine Corporation) hereby stipulate and seek an order of the Court extending certain deadlines in the above-entitled matter, and state as follows:

This case arises from the crash of a Sacramento County Sheriff's Department helicopter on July 13, 2005, which resulted in the deaths of two Sheriff's deputies, injuries to a third deputy, and the loss of the helicopter. The County of Sacramento commenced this action on July 13, 2007, and its insurer, Old Republic Insurance Company, commenced a separate action numbered

STIPULATION AND ORDER
REGARDING EXTENSION OF TIME

1 2:08-cv-01376-WBS-DAD on June 18, 2008. The two cases were consolidated until recently.
2 The damages sought by the County and Old Republic include property loss, reimbursement of
3 insurance payments for the helicopter, reimbursement of workers' compensation payments made
4 to, or on behalf of, the occupants of the helicopter, and loss of use. The helicopter occupants and
5 their families commenced a separate personal injury action against Turbomeca S.A. and
6 Turbomeca USA, but the parties to that action reached a settlement and the case has been
7 dismissed.¹

8 On August 7, 2008, the Court ordered the County's and Old Republic's actions
9 consolidated under master case number 07-CV-01398-WBS-DAD. The court also adopted the
10 scheduling order from the Old Republic action, which set a status conference for December 1,
11 2008, at 2:00 p.m. On November 17, 2008, the Court continued this conference to April 6, 2009.
12 (Docket No. 43.) On March 19, 2009, the Court continued this conference to September 8, 2009.
13 (Docket No. 47.) On July 17, 2009, the court continued this conference to December 14, 2009.
14 (Docket No. 50.)

15 The defendants have filed their answers and the parties have been working diligently to
16 resolve the case informally and without burden on the Court. Counsel for Old Republic and
17 Turbomeca met in person in June 2009 and settled the claims brought by Old Republic. (Notice
18 of Settlement, Docket No. 48.) The Old Republic case has been severed and dismissed. (Docket
19 No. 52.)

20 Counsel for Turbomeca and the County have met in person to discuss resolution of the
21 case and have scheduled informal meetings with each other's witnesses for the purpose of
22 advancing settlement discussions. These meetings are currently scheduled to occur in November
23 2009. The parties intend to have follow-up meetings among counsel to discuss settlement in late
24 2009 or early 2010. The parties have also been in the process of informally exchanging
25 documents and information and have exchanged and are reviewing numerous documents. The
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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 parties mutually desire to avoid unnecessary litigation and expense, and to facilitate an early and
2 cost-effective resolution of these consolidated cases.

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

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

10 1) That the deadline for completion of the Rule 26(f) conference of the parties is
11 extended to March 12, 2010;

12 2) That the deadline for the exchange of initial disclosures is extended to April 9,
13 2010; and

14 3) That the initial scheduling conference currently set for December 14, 2009 is
15 continued to a date no earlier than April 19, 2010.

16 DATED: November 10, 2009

PERKINS COIE LLP

17
18 By: /s/Brendan Murphy
Brendan Murphy

19 Attorneys for Defendants
20 Turbomeca S.A. and Turbomeca USA, Inc.

21 DATED: November 10, 2009

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

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

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25 Attorneys for Plaintiff
26 County of Sacramento

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(1) The Initial Conference of the Parties pursuant to Federal Rule of Civil Procedure 26(f) shall occur no later than March 12, 2010;

(2) The Initial Disclosures of the parties pursuant to Federal Rule of Civil Procedure 26(a)(1) shall occur no later than April 9, 2010; and

(3) The Status (Initial Scheduling) Conference currently scheduled for December 14, 2009 is vacated and rescheduled for **April 19, 2010, at 2:00 p.m.**

DATED: November 10, 2009

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE