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5 Attorneys for Plaintiff
 6 **COUNTY OF SACRAMENTO**

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA

9 COUNTY OF SACRAMENTO,

Case No. 2:07-CV-01398-WBS-KJN

10 Plaintiff,

**STIPULATION AND [PROPOSED]
 ORDER REGARDING THE USE OF
 DEPOSITIONS FROM A RELATED
 MATTER**

11 v.

12 TURBOMECA, S.A., a French
 13 Corporation; LA SOCIÉTÉ ANONYME
 14 TURBOMECA FRANCÉ, a French
 Corporation, TURBOMECA USA, a
 15 Texas Corporation, TURBOMECA
 ENGINE CORPORATION, a Texas
 Corporation,

16 Defendants.
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18 Plaintiff COUNTY OF SACRAMENTO, (hereinafter referred to as “Plaintiff”), and
 19 Defendants, TURBOMECA, S.A. and TURBOMECA USA (hereinafter collectively referred to
 20 as “Defendants”) hereby stipulate and seek an order of the Court that all depositions of all
 21 witnesses taken in the matter Eric Henrikson et al v. Turbomeca S.A. et al, Case Number No.
 22 2:06-cv-01563-WBS-DAD, will be treated as though they were taken in this case, Case No. 2:07-
 23 CV-01398-WBS-KJN.
 24

25 Despite this stipulation, no party waives any objections to admissibility of any portion of
 26 the above referenced depositions under the Federal Rules of Evidence.
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1 This Stipulation and Order may be executed in counter-part, and faxed and/or authorized
2 electronic signature shall be deemed the same as an original execution.

3 DATED: February 3, 2012

LENAHAN, LEE, SLATER & PEARSE, LLP

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6 By: /s/ Charleton S. Pearse
7 CHARLETON S. PEARSE
8 ADAM M. AMBROZY
9 BENJAMIN D. ORAM
Attorneys for Plaintiff,
COUNTY OF SACRAMENTO

10 DATED: February 3, 2012

PERKINS COIE, LLP

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13 By: /s/ Brendan Murphy
14 BRENDAN MURPHY
15 Attorneys for Defendant,
16 TURBOMECA, S.A. and TURBOMECA USA
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ORDER

IT IS HEREBY ORDERED THAT:

- (1) All depositions of all witnesses taken in the matter Eric Henrikson et al v. Turbomeca S.A. et al, Case Number No. 2:06-cv-01563-WBS-DAD, will be treated as though they were taken in this case, Case No. 2:07-CV-01398-WBS-KJN.
- (2) All parties have not waived any objections to admissibility of any portion of the above referenced depositions under the Federal Rules of Evidence.

Dated: February 22, 2012



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE