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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,
 10
 11 Plaintiff,

12 v.

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

16
 17 Defendants.

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

**STIPULATION AND [PROPOSED]
 ORDER REGARDING EXTENSION OF
 EXPERT WITNESS DISCLOSURE AND
 DISCOVERY DATES**

18 In order to facilitate mediation and informal disclosure of expert reports prior to
 19 mediation, Plaintiff COUNTY OF SACRAMENTO, (hereinafter referred to as "Plaintiff"), and
 20 Defendants, TURBOMECA, S.A. and TURBOMECA USA (hereinafter collectively referred to
 21 as "Defendants") hereby stipulate and seek an order of the Court modifying the Court's April 1,
 22 2011 scheduling order as follows:
 23

24 (1) **Section IV:**

25 Expert disclosure date: April 25, 2012

26 Rebuttal expert witness disclosure: May 25, 2012
 27
 28

1 All discovery to be completed: June 25, 2012

2 All motions to compel discovery noticed and on calendar: June 25, 2012

3 **Section V:**

4 All motions filed: July 25, 2012

- 5 (2) The following dates are to remain unchanged and as ordered by the Court in its April 1,
6 2011 scheduling order and are as follows:

7 **Section VI:**

8 Final Pretrial Conference: August 20, 2012

9 **Section VII:**

10 Jury Trial: October 16, 2012

- 11 (3) No other aspects of the April 1, 2011 scheduling order are modified, altered, or changed.

12 This Stipulation and Order may be executed in counter-part, and faxed and/or authorized
13 electronic signature shall be deemed the same as an original execution.

14 DATED: March 5, 2012

LENAHAN, LEE, SLATER & PEARSE, LLP

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18 By: /s/Charleton S. Pearse
19 CHARLETON S. PEARSE
20 ADAM M. AMBROZY
21 BENJAMIN D. ORAM
22 Attorneys for Plaintiff,
23 COUNTY OF SACRAMENTO

24 DATED: March 5, 2012

PERKINS COIE, LLP

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26 By: /s/Brendan Murphy
27 BRENDAN MURPHY
28 Attorneys for Defendant,
TURBOMECA, S.A. and TURBOMECA USA

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ORDER

IT IS HEREBY ORDERED THAT:

(1) The scheduling order is modified as follows:

Section IV of the 4/1/2011 scheduling order:

Expert disclosure date: April 25, 2012

Rebuttal expert witness disclosure: May 25, 2012

All discovery to be completed: June 25, 2012

All motions to compel discovery noticed and on calendar: June 25, 2012

Section V of the 4/1/2011 scheduling order:

All motions filed: July 25, 2012

(2) The following dates are to remain as ordered by the Court in its April 1, 2011 scheduling order and are as follows:

Section VI of the 4/1/2011 scheduling order:

Final Pretrial Conference: August 20, 2012

Section VII of the 4/1/2011 scheduling order:

Jury Trial: October 16, 2012

(3) No other aspects of the April 1, 2011 scheduling order are modified, altered, or changed.

Dated: March 6, 2012



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE