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12 Attorneys for Defendants and Cross-
13 Defendants KAMEHAMEHA SCHOOLS/
BERNICE PAUAHI BISHOP ESTATE; J.
14 DOUGLAS ING, NAINOA THOMPSON,
DIANE J. PLOTTS, ROBERT K.U. KIHUNE,
15 and CORBETT A.K. KALAMA, in their
capacities as Trustees of the Kamehameha
16 Schools/Bernice Pauahi Bishop Estate

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19 ERIC GRANT,
20 Plaintiff,
21 v.
22 KAMEHAMEHA SCHOOLS/BERNICE
23 PAUAHI BISHOP ESTATE; J. DOUGLAS
24 ING, NAINOA THOMPSON, DIANE J.
25 PLOTTS, ROBERT K.U. KIHUNE, and
26 CORBETT A.K. KALAMA, in their capacities
27 as Trustees of the Kamehameha
28 Schools/Bernice Pauahi Bishop Estate; JOHN
DOE; and JANE DOE,
Defendants.
And Related Cross and Counterclaims.

No. 08-00672 FCD-KJM

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
AND FOR ADDITIONAL PAGES

1 Plaintiff and Counter-Defendant Eric Grant, Defendants, Cross and Counter-Claimants
2 John Doe and Jane Doe and Defendants and Cross-Defendants Kamehameha Schools/Bernice
3 Pauahi Bishop Estate; J. Douglas Ing, Nainoa Thompson, Diane J. Plotts, Robert K.U. Kihune,
4 And Corbett A.K. Kalama (collectively, “KS”), through their counsel of record, hereby stipulate
5 as follows:

6 WHEREAS, Plaintiff and Counter-Defendant Eric Grant filed his complaint in this action
7 on March 28, 2008; and

8 WHEREAS, Defendants, Cross and Counter-Claimants John Doe and Jane Doe
9 (collectively, the “Does”) filed their Cross and Counterclaim on April 1, 2008; and

10 WHEREAS, on April 24, 2008, the Court entered a Stipulation and Order Regarding
11 Nondisclosure which provided, *inter alia*, that KS shall answer, move, or otherwise respond to
12 Grant’s Complaint and the Does’ Cross-Claim on or before June 9, 2008, unless the parties agree
13 otherwise; and

14 WHEREAS, the parties have agreed to a Stipulated Protective Order and are awaiting its
15 approval by the Court before producing confidential documents or confidential information in
16 response to discovery requests, and

17 WHEREAS, the parties need additional time for the briefing in connection with KS’
18 responsive motions as well as additional pages for their respective briefs;

19 NOW, THEREFORE, the parties hereby agree and stipulate to the following:

20 1. KS shall file its motions to dismiss Grant’s Complaint and the Does’ Cross-
21 Claim on or before July 9, 2008 and shall set the motions for hearing not less than thirty-five
22 (35) days after filing and electronic service thereof.

23 2. Notwithstanding Local Rule 78-230(c), Grant and the Does may serve their
24 oppositions by electronic service not less than fourteen (14) days preceding the hearing date.

25 3. The page limit for KS’ opening brief and Grant’s and the Does’ oppositions shall
26 be 25 pages and the page limit for KS’ consolidated reply brief shall be 20 pages.

1 DATED: June 5, 2008

BANKS & WATSON

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By: /s/ James J. Banks

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JAMES J. BANKS
Attorneys for Plaintiff and Counter-
Defendant ERIC GRANT

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6 DATED: June 6, 2008

BINGHAM McCUTCHEN LLP

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ALSTON HUNT FLOYD & ING

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By: /s/ Paul Alston

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PAUL ALSTON
CHARLENE SHIMADA
Attorneys for Defendants and Cross-
Defendants KAMEHAMEHA
SCHOOLS/BERNICE PAUAAHI BISHOP
ESTATE; J. DOUGLAS ING, NAINOA
THOMPSON, DIANE J. PLOTTS,
ROBERT K.U. KIHUNE, and CORBETT
A.K. KALAMA, in their capacities as
Trustees of the Kamehameha
Schools/Bernice Pauahi Bishop Estate

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16 DATED: June 6, 2008

LEVIN & STEIN

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KUNIYUKI & CHANG

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By: /s/ Jerry H. Stein

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JERRY H. STEIN
Attorneys for Defendants and
Counterclaimants JOHN DOE and JANE
DOE

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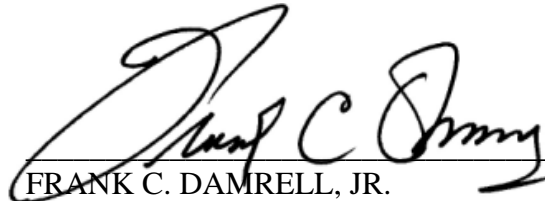
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3 **ORDER**

4 Based upon the stipulation of the parties reflected above, and good cause
5 appearing therefor:

6 IT IS SO ORDERED.

7 Dated: June 9, 2008

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9 FRANK C. DAMRELL, JR.
10 UNITED STATES DISTRICT JUDGE
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