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Attorneys for Defendants
Brusco Tug and Barge and The Dutra Group

E-Filing
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOHN D. HIGGINS, JR.,)	Case No.: 2:08-CV-02300-WBS-KJN
)	
Plaintiff,)	JOINT STIPULATION TO
)	EXTEND DEADLINES AND
v.)	[PROPOSED] ORDER
)	
BRUSCO TUG AND BARGE AND THE)	
DUTRA GROUP,)	
Defendants.)	
_____)	

WHEREAS the the Plaintiff moved for and was granted a 60-day trial continuance on May 20, 2010.

WHEREAS the trial continuance Order set the discovery deadline including expert disclosures to July 30, 2010, the pretrial conference to September 7, 2010 and jury trial on November 9, 2010.

WHEREAS the parties having been working diligently to prepare this matter for trial on November 9, 2010, are prepared to provide expert disclosure and reports by the July 30, 2010 deadline and are not seeking an extension of trial date, the parties request additional time as follows to fully investigate the plaintiff's claims for traumatic brain injury:

1. The Depositions of Dr. Rinzler and Dr. Pantazis may be conducted after the

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discovery cutoff date and are to be completed no later than August 30, 2010;

2. Rebuttal expert disclosure and exchange of reports by September 15, 2010;

3. Close of expert discovery on October 15, 2010; and

4. Pre-trial Conference October 19, 2010

The parties further stipulate that in the event a further IME of the plaintiff is required, such motion may be heard on shortened notice of seven (7) days.

DATED: July 23, 2010

COX, WOOTTON, GRIFFIN,
HANSEN & POULOS, LLP

Attorneys for Defendants

Brusco Tug and Barge and The Dutra Group

By _____/S/
Richard C. Wootton

DATED: July 23, 2010

LAW OFFICES OF DANIEL RAY BACON

Attorneys for Plaintiff

John D. Higgins, Jr.

By _____/S/
Daniel Ray Bacon

ORDER

Pursuant to the stipulation of the Parties in this action, through the respective counsel for the parties, and good cause appearing,

IT IS ORDERED

1. The Depositions of Dr. Rinzler and Dr. Pantazis may be conducted after the discovery cutoff date and are to be completed no later than August 30, 2010;

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2. Rebuttal expert disclosure and exchange of reports by September 15, 2010;
3. Close of expert discovery on October 15, 2010; and
4. Pre-trial Conference **October 18, 2010 at 2:00 p.m.**

DATED: July 22, 2010



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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