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1 2 3 4 5	MARY-OLGA LOVETT, admitted <i>pro hac vice</i> lovettm@gtlaw.com STEPHEN E. PAFFRATH, SBN 195932 paffraths@gtlaw.com GREENBERG TRAURIG, LLP 1201 K Street, Suite 1100 Sacramento, CA 95814 Telephone: (916) 442-1111 Facsimile: (916) 448-1709	MCGREGOR W. SCOTT, SBN 142413 mcgregor.scott@orrick.com MICHAEL C. WEED, SBN 199675 mweed@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP 400 Capitol Mall, Suite 3000 Sacramento, CA 95814 Telephone: (916) 447-9200 Facsimile: (916) 329-4900
6 7	Attorneys for Plaintiff and Counter-Defendant Pacific Rail LLC f/k/a Patriot Rail LLC	Attorneys for Defendant and Counterclaimant Sierra Railroad Company
8	UNITED STATES I	DISTRICT COURT
9	EASTERN DISTRIC	T OF CALIFORNIA
10	SACRAMENT	TO DIVISION
11		
12	PATRIOT RAIL CORP., a Delaware	Case No. 2:09-cv-00009-TLN-AC
13	corporation,	STIPULATION AND [PROPOSED]
14	Plaintiff,	ORDER CONTINUING HEARING DATE ON SIERRA'S MOTION TO
15	v.	COMPEL POST-JUDGMENT
16	SIERRA RAILROAD COMPANY, a	DISCOVERY
10	California corporation,	<u>Current Hearing Date</u> : Date: January 20, 2016
	Defendant.	Time:10:00 a.m.Dept:Courtroom 26
18	And Related Counterclaim	Judge: Hon. Allison Claire
19		Proposed New Hearing Date: Date: February 3, 2016
20		Time: 10:00 a.m. Dept: Courtroom 26
21		Judge: Hon. Allison Claire
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23	///	
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	STIPULATION AND [PROPOSED] OR	DER CONTINUING HEARING DATE

1	STIPULATION		
2	Defendant and Counterclaimant Sierra Railroad Company ("Sierra") and Plaintiff and		
3	Counter-defendant Pacific Rail LLC f/k/a Patriot Rail LLC ("PR LLC") hereby stipulate to		
4	continue the hearing date relating to Sierra's pending Motion to Compel Discovery, currently set		
5	for hearing on January 20, 2016.		
6	On December 29, 2015, Sierra filed a Motion to Compel Post-Judgment Discovery from		
7	PR LLC. ECF No. 688. Subject to the Court's approval, Sierra and PR LLC have agreed to		
8	continue the hearing date on Sierra's Motion by two weeks to allow PR LLC time to amend		
9	and/or supplement its responses to Sierra's discovery requests.		
10			
11	Respectfully submitted,		
12			
13	Ducu. Junuary 15, 2010		
14	STEPHEN E. PAFFRATH GREENBERG TRAURIG, LLP		
15		16)	
16	By: /s Stephen E. Paffrath (as authorized on 1-13 STEPHEN E. PAFFRATH Attorneys for Plaintiff and Counter-Defendant	<u>-10)</u>	
17	Pacific Rail LLC f/k/a Patriot Rail LLC		
18	Dated: January 13, 2016 MCGREGOR W. SCOTT		
19	MICHAEL C. WEED ORRICK, HERRINGTON & SUTCLIFFE LLP		
20	OKNICK, HERRINOTON & SOTELITTE EEI		
21	By: /s Michael C. Weed MICHAEL C. WEED		
22	Attorneys for Defendant and Counterclaimant Sierra Railroad Company		
23	Storra Ramoud Company		
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	STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING DATE		

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1		[ <del>PROPOSED</del> ] ORDER
2	IT IS SO ORDERED.	
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4	DATED: January 13, 2016	auson Clane
5		ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE
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