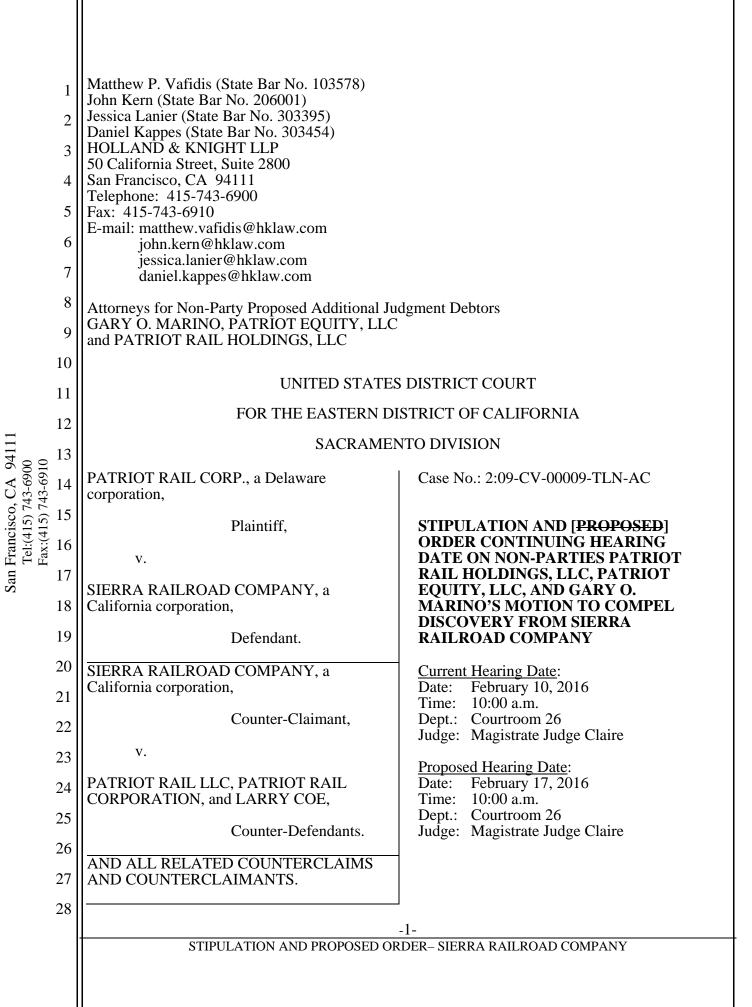
50 California Street, 28th Floor

Holland & Knight LLP



1	STIPULATION		
2	Non-Parties Gary O. Marino, Patriot Equity, LLC, and Patriot Rail Holdings, LLC (n/k/a		
3	Pacific Rail Holdings, LLC) (collectively "Non-Parties") and Defendant and Counter-Claimant		
4	Sierra Railroad Company ("Sierra") hereby stipulate to continue the hearing date relating to Non-		
5	Parties pending Motion to Compel Further Responses to Non-Parties Subpoenas Seeking (1)		
6	Production of Documents and (2) Deposition Testimony currently set for hearing on February 10, 2016.		
7			
8	On January 20, 2016, Non-Parties filed a Motion to Compel Discovery from Sierra. ECF		
9	No. 697. Subject to the Court's approval, Non-Parties and Sierra have agreed to continue the		
10	hearing date on Non-Parties' Motion by one week to finalize the Joint Statement of the Parties.		
11			
12 II	2 Respectfully submitted,		
lland & Knight LLP fornia Street, 28th Floor Francisco, CA 94111 Tel:(415) 743-6900 Fax:(415) 743-6910 91 51 71 51 71 51 51 51 51 51 51 51 51 51 51 51 51 51	3 Dated: February 1, 2016 HOLLAND & KNIGHT LLP		
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lland & Knight LJ fornia Street, 28th Francisco, CA 94 Tel:(415) 743-6900 Fax:(415) 743-6910 91 51 71 71	By: <u>/s/ John Kern</u>		
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	Attorneys for Non-Party Proposed Additional Judgment Debtors GARY O. MARINO, PATR EQUITY, LLC and PATRIOT RAIL HOLDIN LLC		
	21	1 Dated: February 1, 2016 ORRICK, HERRINGTON & SUTCL	JIFFE LLP
22	22		
23		By: /s/ J.R. Riddell (authorized on 2-1-2016)	
24	J.R. Riddell		
25	5 Attorneys for Defendant and Counter SIERRA RAILROAD COMPANY	claimant	
26	6		
27	7		
28			
	-2- STIPULATION AND PROPOSED ORDER– SIERRA RAILROAD COMPANY		

