Randall C. Nelson, State Bar No. 138298 1 CARR, KENNEDY, PETERSON & FROST A Law Corporation 2 420 Redcliff Drive Redding, California 96002 3 (530) 222-2100; FAX (530) 222-0504 4 Attorneys for Defendants Jason Eatmon, individually and d/b/a KDJ Enterprises, a general partnership; 5 Dan Lockwood, individually and d/b/a KDJ Enterprises, a general partnership; and Development 6 Group, Inc., a California corporation 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 TEAM ONE NETWORKING, a California NO. 2:09-CV-00903-WBS-DAD 12 Corporation; STIPULATION AND ORDER TO Plaintiff. MODIFY THE STATUS (PRETRIAL 13 SCHEDULING) ORDER RE EXPERT **DISCOVERY** 14 VS. JASON EATMON, individually and d/b/a 15 KDJ Enterprises, a general partnership; DAN LOCKWOOD, individually and d/b/a 16 KDJ Enterprises, a general partnership; DEVELOPMENT GROUP, INC., a 17 California corporation; and DOES 1 through 10, inclusive, 18 Defendants. 19 20 The Court's August 5, 2009 Status (Pretrial Scheduling) Order establishes an expert 21 witness disclosure date of February 12, 2010, a supplemental expert witness disclosure date of 22 April 2, 2010, and a deadline for completion of discovery of May 28, 2010, which would be 23 inclusive of all expert witness discovery. 24 The parties are presently conducting written discovery and contemplate proceeding with 25 all necessary depositions to be completed before discovery deadline. However, due to the 26

1	technical nature of this case and the fact that the determination of appropriate expert witnesses
2	depends to a great extent on deposition testimony to be provided by certain percipient
3	witnesses whose depositions will likely not be taken until March or April of this year, it is
4	apparent to the parties that it is not realistic to disclose expert witnesses and conduct expert
5	witness discovery before the completion of percipient discovery. In order to provide all parties
6	sufficient time to prepare substantive disclosures of expert witnesses and to conduct thorough
7	discovery of expert witnesses, the parties propose to amend the schedule to provide for the
8	following dates:
9	DISCLOSURE OF EXPERTS JUNE 11, 2010
10	DISCLOSURE OF SUPPLEMENTAL EXPERTS JUNE 25, 2010
11	COMPLETION OF EXPERT WITNESS DISCOVERY JULY 9, 2010
12	All other deadlines (completion of discovery, motion hearing schedule, final pretrial
13	conference, and trial) will remain unchanged.
14	IT IS SO STIPULATED.
15	DATED: March 4, 2010.
16	PALMER KAZANJIAN WOHL HODSON LLP
17	I ALMER RAZANJIAN WOLL HODSON LEI
18	By /s/Jennifer L. McQuarrie (as authorized on 03/01/10) Jennifer L. McQuarrie
19	Attorneys for Plaintiff
20	DATED: March 4, 2010.
21	CARR, KENNEDY, PETERSON & FROST
22	By /s/Randall C. Nelson
23	Randall C. Nelson Attorneys for Defendants Jason Eatmon, individually
24	and d/b/a KDJ Enterprises, a general partnership; Dan Lockwood, individually and d/b/a KDJ
25	Enterprises, a general partnership; and Development Group, Inc., a California corporation
26	Group, me., a Camornia corporation

ORDER

IT IS SO ORDERED.

DATED: March 4, 2010

Milliam & Shibt

UNITED CERTED DICEDIO

UNITED STATES DISTRICT JUDGE