

1 Christopher Wohl, SBN: 170280
 Jennifer L. McQuarrie, SBN: 191730
 2 PALMER KAZANJIAN WOHL HODSON, LLP
 3 520 Capitol Mall, Suite 600
 Sacramento, California 95814
 4 Phone: 916-442-3552

5 Attorneys for Plaintiff and Counterdefendant,
 TEAM ONE NETWORKING

6
 7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA

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10 TEAM ONE NETWORKING, a California
 Corporation;

CASE NO. 2:09-cv-00903

11 Plaintiffs,

12 v.

**STIPULATION AND ORDER TO
 MODIFY THE STATUS (PRETRIAL
 SCHEDULING) ORDER RE
 DISCOVERY**

13 JASON EATMON, individually; DAN
 LOCKWOOD, individually,
 14 DEVELOPMENT GROUP, INC. a
 California corporation,; and, DOES 1
 through 10, inclusive,

15 Defendants.

The Honorable William B. Shubb

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 17 DAN LOCKWOOD,

18 Counterclaimant,

19 v.

20 TEAM ONE NETWORKING, a California
 Corporation;

21 Counterdefendant.
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23 The Court's August 5, 2009 Status (Pretrial Scheduling) Order originally established an
 24 expert witness disclosure date of February 12, 2010, a supplemental expert witness disclosure date of
 25 April 2, 2010, and a deadline for completion of discovery of May 28, 2010, which would be inclusive
 26 of all expert witness discovery and discovery motions.
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1 The parties previously submitted to the Court a Stipulation modifying the deadlines relating to
2 expert disclosure and expert discovery. The parties continue to conduct written discovery but have not
3 yet begun proceeding with all necessary depositions. Due to the technical nature of this case, the
4 speed with which the parties have been able to produce electronic documentation has been slower
5 than expected. Despite the delays, the parties have been diligent in their efforts.

6 In light of these delays, it is apparent to the parties that it is not realistic that the depositions of
7 percipient witnesses will be completed until July, with expected expert discovery thereafter. In order
8 to provide the parties sufficient time to prepare for the November 30, 2010 trial date, the parties
9 propose to amend the schedule to provide for the following dates:

10	DISCLOSURE OF EXPERTS	AUGUST 20, 2010
11	DISCLOSURE OF SUPPLEMENTAL EXPERTS	SEPTEMBER 3, 2010
12	COMPLETION OF ALL DISCOVERY (INCLUDING EXPERT)	SEPTEMBER 17, 2010
13	DISPOSITIVE MOTION HEARING DEADLINE	OCTOBER 31, 2010

14 All other deadlines (final pretrial conference and trial) will remain unchanged.

15 IT IS SO STIPULATED.

16 CARR, KENNEDY, PETERSON & FROST

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18 Dated: _____

By: /s/ Randall Nelson
Randall Nelson, Esq.
Attorneys for Defendants and
Counterclaimants
Jason Eatmon, Dan Lockwood and
Development Group, Inc.

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22 PALMER KAZANJIAN WOHL HODSON, LLP

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24 Dated: _____

By: /s/ Christopher F. Wohl
Christopher F. Wohl
Attorneys for Plaintiff and Counterdefendant
Team One Networking, Inc.

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ORDER

Upon the agreement of the parties hereto, and Good Cause appearing
IT IS SO ORDERED.

DATED: May 5, 2010



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE