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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
 CONTINUE THE TRIAL DATE,
 MODIFY THE STATUS (PRETRIAL
 SCHEDULING) ORDER AND AMEND
 THE COUNTERCLAIM OF DAN
 LOCKWOOD**

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

16 Defendants.

17 DAN LOCKWOOD,

The Honorable William B. Shubb

18 Counterclaimant,

19 v.

20 TEAM ONE NETWORKING, a California
 Corporation;

21 Counterdefendant.
 22

23 WHEREAS, the parties agreed to modify the Court's August 5, 2009 Status (Pretrial
 24 Scheduling) Order ("Scheduling Order") extending deadlines for the original expert witness
 25 disclosure, the supplemental expert witness disclosure, and the deadline for completion of discovery.
 26 The Court approved the stipulation on March 4, 2010.
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1 WHEREAS, in April 2010, the parties further agreed to modify the Scheduling Order
2 extending discovery and related deadlines closer to the trial date. The Court approved the stipulation
3 on May 5, 2010.

4 WHEREAS, defendant and counterclaimant Lockwood has determined as a result of further
5 review of discovery responses and other documentation, that additional claims for relief exist relating
6 to the employment relationship between Lockwood and Team One Networking that should be brought
7 in this action, Lockwood's Counterclaim should be amended to add such additional claims for relief
8 in the form of a First Amended Counterclaim.

9 WHEREAS, the parties continue to exchange documents responsive to the discovery requests,
10 which exchange has been much slower than expected due to the technical nature of the electronic
11 documentation. The parties wish to complete discovery in November in order to conduct a
12 meaningful mediation in December 2010. The delays, coupled with unavailability for depositions and
13 an earlier trial date due to conflicting trial obligations of counsel, have necessitated the need to move
14 the trial date to March 22, 2011.

15 The parties hereby agree that defendant and counterclaimant Dan Lockwood may file his First
16 Amended Counterclaim, a copy of which is attached hereto as Exhibit A.

17 The parties further agree to modify the Scheduling Order in the following ways and ask that
18 the Court approve this modification:

19	COMPLETION OF ALL PERCIPIENT DISCOVERY	NOVEMBER 15, 2010
20	MEDIATION TO BE COMPLETED BY	DECEMBER 17, 2010
21	DISCLOSURE OF EXPERTS	DECEMBER 31, 2010
22	DISCLOSURE OF SUPPLEMENTAL EXPERTS	JANUARY 14, 2011
23	EXPERT DISCOVERY COMPLETED	FEBRUARY 22, 2011
24	DISPOSITIVE MOTION HEARING DEADLINE	FEBRUARY 22, 2011
25	PRETRIAL CONFERENCE STATEMENT	FEBRUARY 26, 2011
26	PRETRIAL CONFERENCE	MARCH 8, 2011
27	TRIAL	MARCH 22, 2011
28	IT IS SO STIPULATED.	

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CARR, KENNEDY, PETERSON & FROST

Dated: _____

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

PALMER KAZANJIAN WOHL HODSON, LLP

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: August 26, 2010



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE