1 Mark E. Ellis - 127159 Ronald R. Poirier - 175511 2 Teresa Zuber - 164213 ELLIS, LaVOIE, POIRIER, 3 STEINHEIMER & McGEE LLP 555 University Avenue, Suite 200 East 4 Sacramento, CA 95825 Tel: (916) 283-8820 5 Fax: (916) 283-8821 mellis@ecplslaw.com tzuber@ellislawgrp.com rpoirier@ellislawgrp.com 7 Attorneys for Plaintiff JENNIFER ZAMORA 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 12 JENNIFER ZAMORA, Case No.: 2:09-CV-1292-JAM-EFB 13 Plaintiff, STIPULATION AND ORDER REGARDING TIMING FOR PLAINTIFF'S EXPERT 14 WITNESS DISCLOSURES 15 **EXPERT DISCLOSURE DATE: 9/10/10** JANET NAPOLITANO, SECRETARY OF THE DEPARTMENT OF HOMELAND SECURITY; 16 GALE ROSSIDES, ASSISTANT SECRETARY/ACTING ADMINISTRATOR OF 17 THE TRANSPORTATION SECURITY ADMINISTRATION; LOREN ISHII; and DOES 18 1-20, 19 Defendants. 20 **STIPULATION** 21 The parties, by and through their attorneys of record herein, stipulate and agree as follows: 22 1. The pretrial order in this case, filed by the Court on August 25, 2009, sets the date by 23 which Plaintiff Jennifer Zamora must file her expert witness disclosures on September 10, 2010. 24 2. Plaintiff states that, because of unanticipated delays in determining whether one of the 25 expert witnesses will be available to testify in this case, she seeks a one week extension of time, until 26 September 17, 2010, to file the disclosures. 27 28 - 1 -STIPULATION AND ORDER REGARDING TIMING FOR PLAINTIFF'S EXPERT DISCLOSURES

3. Defendants will agree to an extension of time to September 17, 2010, solely with
respect to the one expert witness whose availability is in question, on the following conditions:
a. On September 10, 2010, plaintiff must file a disclosure which identifies by name
the one expert witness whose availability is in question;
b. If the one expert witness whose availability is in question has already prepared
his or her expert report, that report must also be filed on September 10, 2010, subject to withdrawal
should plaintiff determine that the witness is in fact unavailable to testify in this case; and
c. Plaintiff must timely file expert witness disclosures and reports for any and all
other expert witnesses she intends to offer in this case on September 10, 2010.
Respectfully submitted,
Dated: September 10, 2010
ELLIS, LAVOIE, POIRIER, STEINHEIMER & MCGEE LLP
Dry /s/Tagasa I. Zwhag
By <u>/s/ Teresa L. Zuber</u> Teresa L. Zuber Attorney for Plaintiff
JENNIFER ZAMORA
Dated: September 10, 2010
BENJAMIN B. WAGNER UNITED STATES ATTORNEY
CIVILD STATES AT TORIVET
By <u>/s/ Jason Ehrlinspiel</u> Jason Ehrlinspiel
Assistant United States Attorney Attorneys for Defendants
Theorie jo for Belendants
<u>ORDER</u>
IT IS SO ORDERED.
Dated: 9/10/2010
<u>/s/ John A. Mendez</u> HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT JUDGE
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