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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

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1 JAMES T. CARDEN, JR.,
2 ROBERT L. FOX,
3 LEON W. HEDRICK,
4 ROBERT B. KLEE,
5 GEORGE M. LEMBO,
6 LOREN E. LOVELAND,
7 TERRY D. MYERS,
8 CHARLES R. SAMUELSON,
9 MICHAEL B. SCHAEFER,
10 ARTHUR J. SCHUBERT,
11 THURLOW E. WILLIAMS,
12 MICHELLE W. WOODS,
13 RAYMOND E. YOUNG,
14 WILLIAM H. ZIEGLER,
15
16 Plaintiffs,

17 vs.

18 CHENEGA SECURITY &
19 PROTECTION SERVICES, LLC,
20
21 Defendant

CASE No. 2:09-cv-01799-WBS-CMK

**STIPULATION AND JOINT
APPLICATION TO EXTEND
DISCOVERY CUT-OFF;**

ORDER THEREON

Complaint Filed: June 29, 2009
Trial Date: April 5, 2011

22 Pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause
23 shown, the parties to this action, through their respective counsel of record, hereby
24 stipulate and jointly request that the Court vacate the present discovery cut-off date
25 of November 1, 2010 and related discovery deadlines in paragraph IV of this
26 Court's Status (Pretrial Scheduling Order) dated October 29, 2009 and the Parties'
27 Stipulation and Joint Application to Extend Discovery Cutoff and Order Thereon
28 dated February 25, 2010 and the Stipulation and Joint Application to Extend
Discovery Cut-Off on Order Thereon filed June 24, 2010 (the "Orders"), and that
the Court further continue such dates as set forth below. **The requested
continuances will have no impact on the final pre-trial conference, and trial
dates in paragraphs V. VI and VII of the Pretrial Scheduling Order.**

THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1 WHEREAS counsel for the Parties have diligently engaged discovery and
2 engaged in recent attempts to mediate the issues in this action without success; and
3 whereas the parties have heretofore engaged in discovery in a cooperative manner,
4 but believe that due to the number of parties and the nature and complexity of
5 issues in the case, additional time to complete discovery is necessary to prepare the
6 case for trial and/or position the case for further attempts at informal resolution.
7 Consequently, good cause exists for continuing the discovery deadlines set forth in
8 the Orders as follows:

9 (1) The deadline of September 1, 2010 to disclose experts and
10 produce reports in accordance with Federal Rule of Civil
11 Procedure 26(a)(2) shall be vacated and continued to September
12 30, 2010;

13 (2) The deadline of October 1, 2010 to disclose experts and
14 produce reports for expert testimony intended solely for rebuttal
15 in accordance with Federal Rule of Civil Procedure 26(a)(2)
16 shall be vacated and continued to October 22, 2010.

17 IT IS SO STIPULATED.

18
19 Date: August 20, 2010

MICHAEL COGAN, ATTORNEY AT LAW

20
21 By: /s/

Michael Cogan
Attorneys for Plaintiffs
James T. Carden, Jr., Robert L. Fox, Leon W.
Hedrick, Robert E. Klee, George M. Lembo,
Loren E. Loveland, Terry D. Myers, Charles R.
Samuelson, Michael B. Schaeffer, Arthur J.
Schubert, Thurlow E. Williams, Michelle S.
Woods, Raymond L. Young, William H. Ziegler

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/ / /

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2 Date: August 20, 2010

NAGELEY, MEREDITH AND MILLER

3 By: /s/

Andrea Miller

Attorneys for Plaintiffs

James T. Carden, Jr., Robert L. Fox, Leon W.

Hedrick, Robert E. Klee, George M. Lembo,

Loren E. Loveland, Terry D. Myers, Charles R.

Samuelson, Michael B. Schaeffer, Arthur J.

Schubert, Thurlow E. Williams, Michelle S.

Woods, Raymond L. Young, William H. Ziegler

8 Date: August 6, 2010

JACKSON LEWIS LLP

9 By: /s/

Cary G. Palmer

Dale R. Kuykendall

Jerry J. Deschler, Jr.

Attorneys for Defendant

Chenega Security Protection Services, LLC

15 **ORDER**

16 Having reviewed the parties' stipulation, and good cause appearing
17 therefore,


19 IT IS HEREBY ORDERED:

- 21 (1) The deadline of September 1, 2010 to disclose experts and
22 produce reports in accordance with Federal Rule of Civil
23 Procedure 26(a)(2) shall be vacated and continued to September
24 30, 2010;
- 25 (2) The deadline of October 1, 2010 to disclose experts and
26 produce reports for expert testimony intended solely for rebuttal
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in accordance with Federal Rule of Civil Procedure 26(a)(2)
shall be vacated and continued to October 22, 2010.

DATED: August 31, 2010August 31,
2010



CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE