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9 Attorneys for Defendants PRIDE INDUSTRIES,
10 INC., and PRIDE INDUSTRIES ONE., INC.
11

12 UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA, ex. rel.
15 TIMOTHY HEDIGER AND LOIS PEREZ,

16 Plaintiffs,

17 v.

18 PRIDE INDUSTRIES, INC., and PRIDE
19 INDUSTRIES ONE, INC.,

20 Defendants.

Case No. 2:09-cv-1858 GEB GGH

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR
DISCLOSURE OF EXPERT
WITNESSES**

21 Plaintiffs TIMOTHY HEDIGER and LOIS PEREZ and Defendants PRIDE
22 INDUSTRIES, INC., and PRIDE INDUSTRIES ONE, INC., hereby stipulate and agree to
23 continue the deadline to exchange initial expert witness disclosures and rebuttal expert witness
24 disclosures. The current deadline for the exchange of initial expert witness disclosures is October
25 1, 2012, and rebuttal expert disclosures are due by November 1, 2012. Discovery does not close
26 until February 15, 2013. The parties are currently in fact discovery. Plaintiffs' have propounded
27 requests for admission, requests for production of documents and special interrogatories.
28 Defendants' responses are due in late August, and Defendants have requested an extension of 28
days.

1 Defendant also served written discovery and requests for documents to the plaintiffs.
2 Extensions were also granted for plaintiffs to respond. The parties are currently conferring
3 regarding scheduling depositions of various fact witnesses, as well as potential mediation. The
4 parties' request to continue the date of expert disclosures will not extend the discovery deadline
5 or other scheduled case matters.

6 **IT IS THEREFORE HEREBY STIPULATED** by and between the parties hereto
7 through their respective attorneys that the deadlines relating to expert disclosures be continued as
8 follows:

- 9 1. Disclosure of expert witnesses - January 9, 2013;
- 10 2. Supplemental disclosure of experts – January 23, 2013;

11
12 Dated: August 14, 2012

MATHENY SEARS LINKERT & JAIME, LLP


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14 By: /s/ MICHAEL A. BISHOP
15 MICHAEL A. BISHOP, ESQ.
16 N. KATE JEFFRIES, ESQ.
17 Attorneys for Defendants PRIDE
INDUSTRIES, INC., and PRIDE
INDUSTRIES ONE., INC.

18 Dated: [August 13, 2012](#)

19 By: [/s/ MICHAEL A. HIRST, ESQ.](#)
20 [as authorized on 8/13/12](#)
21 MICHAEL A. HIRST, ESQ.
22 Attorney for Plaintiffs TIMOTHY
HEDIGER and LOIS PEREZ

23 **IT IS SO ORDERED.**

24
25 Dated: August 15, 2012

26 
27 HON. GARLAND E. BURRELL, JR.
28 JUDGE OF THE UNITED STATES DISTRICT
COURT, EASTERN DISTRICT OF CALIFORNIA