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 8
 9 IN THE UNITED STATES DISTRICT COURT FOR THE
 10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)	Case No.: 2:09-cv-02868 JAM-JFM
)	
12)	
13 Plaintiff,)	STIPULATION AND ORDER CONTINUING
)	TRIAL DATE AND RELATED DEADLINES
14 v.)	
)	
15 PACIFIC GAS & ELECTRIC)	
16 COMPANY, DAVEY TREE SURGERY)	
COMPANY, and THE DAVEY TREE)	
17 EXPERT COMPANY,)	Current Trial Date: July 11, 2011
)	Current PTC Date: June 3, 2011
18 Defendants.)	
)	
19)	

20 For the reasons set forth in the accompanying Declaration of Glen F. Dorgan, Plaintiff,
 21 United States of America, and Defendants, Pacific Gas & Electric Company, and Davey Tree
 22 Surgery Company, through their counsel of record, stipulate as follows:

23 1. The parties request a continuance of the following dates and deadlines:

	<u>Current Date</u>	<u>New Date</u>
24 Expert discovery Cut-off	May 13, 2011	July 8, 2011
25 Filing of Pre-trial Statements	May 27, 2011	July 15, 2011
26 Pre-Trial Conference	June 3, 2011 (3:00 p.m.)	July 22, 2011 (11:00 a.m.)
27 Trial	July 11, 2011 (9:00 a.m.)	August 29, 2011 (9:00 a.m.)

1 2. To the extent Plaintiff seeks and recovers pre-judgment interest at trial, the
2 period for any calculation of interest shall not extend past the original trial date of April 11,
3 2011.

4 3. As noted in the prior stipulations for an order modifying the scheduling order, the
5 parties stipulate and agree that no party will file any dispositive motion and all parties have
6 waived their right to file dispositive motions.

7 Respectfully submitted,

8 BENJAMIN B. WAGNER
United States Attorney

9 Dated: May 10, 2011

10 By: /s/ Glen F. Dorgan
11 GLEN F. DORGAN
Assistant United States Attorney
12 Attorney for Plaintiff
UNITED STATES OF AMERICA

13 Dated: May 10, 2011

14 CARLSON, CALLADINE & PETERSON, LLP

15 By: /s/ Randy W. Gimple
16 RANDY W. GIMPLE
A. DAVID BONA
17 Attorneys for Defendant,
DAVEY TREE SURGERY COMPANY

18 Dated: May 10, 2011

19 NIXON PEABODY, LLP

20 By: /s/ Robert M. Blum
21 ROBERT M. BLUM
Attorneys for Defendant
22 DAVEY TREE SURGERY COMPANY

23 Dated: May 10, 2011

24 FERRIS & BRITTON
A PROFESSIONAL CORPORATION

25 By: /s/ Michael R. Weinstein
26 MICHAEL R. WEINSTEIN
Attorneys for Defendant,
27 PACIFIC GAS AND ELECTRIC COMPANY
28

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8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	CASE NO: 2:09-cv-02868 JAM-JFM
)	
11 Plaintiff,)	ORDER CONTINUING
)	TRIAL DATE AND RELATED
12 v.)	DEADLINES
)	
13 PACIFIC GAS & ELECTRIC COMPANY,)	
14 DAVEY TREE SURGERY COMPANY,)	
and THE DAVEY TREE EXPERT)	
15 COMPANY,)	
)	
16 Defendants.)	

17 Based upon the stipulation of the parties, and good cause appearing therefore, IT IS
 18 HEREBY ORDERED that the trial date and related deadlines be moved out as follows:

	<u>Current Date</u>	<u>New Date</u>
19 Expert discovery Cut-off	May 13, 2011	July 8, 2011
20 Filing of Pre-trial Statements	May 27, 2011	July 15, 2011
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24
 25 **IT IS SO ORDERED.**

26
 27 DATED: 5/10/2011

28 /s/ John A. Mendez
 HONORABLE JOHN A. MENDEZ
 UNITED STATES DISTRICT JUDGE