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 7 STRYKER CORPORATION and  
 8 HOWMEDICA OSTEONICS CORP  
 (erroneously sued herein as Stryker Orthopaedics)

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 18 TRAVIS J. CURRIER

19 UNITED STATES DISTRICT COURT  
 20 EASTERN DISTRICT OF CALIFORNIA  
 21 SACRAMENTO DIVISION

22 TRAVIS J. CURRIER, an individual,  
 23 Plaintiff,

24 v.

25 STRYKER CORPORATION; STRYKER  
 26 SALES CORPORATION; HOWMEDICA  
 27 OSTEONICS CORP, dba STRYKER  
 28 ORTHOPAEDICS; and Does 1-20,  
 Defendants.

Case No. 2:11-cv-01203-JAM-EFB

**STIPULATED REQUEST FOR LEAVE  
 TO AMEND SECOND AMENDED  
 COMPLAINT AND CONTINUE PRE-  
 TRIAL SCHEDULING ORDER  
 DEADLINES  
 (AS MODIFIED BY THE COURT)**

THE PARTIES RESPECTFULLY SUBMIT THE FOLLOWING STIPULATED  
 REQUEST, through their respective attorneys of record, as follows:



1           11.     In the alternative, Parties respectfully request that the Pre-trial Scheduling Order be  
2 Amended as follows:

3           12.     It is respectfully requested that the Court, in its discretion, continue all Pre-Trial  
4 Scheduling Order deadlines by eight (8) months to the following:

5                 a.) Plaintiff shall have until July 3, 2012 to amend his Second Amended Complaint  
6 as to the Parties as described in this Stipulation;

7                 b.) All dispositive motions shall be filed by June 26, 2013;

8                 c.) Hearing on such [dispositive] motions shall be on July 24, 2013 at 9:30 a.m.;

9                 d.) All discovery shall be completed by May 7, 2013;

10                e.) The parties shall make expert witness disclosures under Fed. R. Civ. P. 26(a)(2)  
11 by March 12, 2013;

12                f.) Supplemental disclosure and disclosure of any rebuttal experts under Fed. R. Civ.  
13 P. 26(a)(2)(c) shall be made by March 26, 2013;

14                g.) The final pre-trial conference be set for August 28, 2013 at 3:00 p.m.; and

15                h.) Jury trial in this matter be set for September 30, 2013 at 9:00 a.m.

16           13.     In addition, Parties respectfully request that any settlement conference be set for after  
17 April 1, 2013.

18  
19  
20 Dated: May 30, 2012

By: /s/ Victor X. Bertolani  
WILLIAM F. WRIGHT  
VICTOR X. BERTOLANI  
  
Attorneys for Plaintiff TRAVIS J.  
CURRIER

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Dated: May 30, 2012

By: /s/ Amir Nassihi  
ALICIA J. DONAHUE  
AMIR NASSIHI

Attorneys for Defendants STRYKER  
CORPORATION AND HOWMEDICA  
OSTEONICS CORP (erroneously sued  
as Stryker Orthopaedics)

**IT IS SO ORDERED (AS MODIFIED BY THE COURT).**

DATED: May 31, 2012

/s/ John A. Mendez

U. S. DISTRICT COURT JUDGE