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9 Attorneys for Plaintiff/Counter-Defendant
MEYER MANUFACTURING COMPANY LIMITED

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

13 MEYER MANUFACTURING COMPANY
LIMITED, a Hongkong Corporation,

14 Plaintiff,

15 v.

16 TELEBRANDS CORP., a New Jersey
17 Corporation,

18 Defendant,

19 _____
20 TELEBRANDS CORP., a New Jersey
Corporation,

21 Counter-Plaintiff,

22 v.

23 MEYER MANUFACTURING COMPANY
LIMITED, a Hongkong Corporation, and
24 MEYER CORPORATION, U.S.,

25 Counter-Defendants.
26 _____

CASE NO. 2:11-cv-03153 LKK-DAD

**JOINT STIPULATION AND ORDER
TO ADD A REBUTTAL EXPERT
DISCLOSURE DATE TO THE
CURRENT CASE MANAGEMENT
SCHEDULE**

1 Plaintiff/Counter-Defendant Meyer Manufacturing Company Limited, Counter-Defendant
2 Meyer Corporation, U.S., and Defendant/Counter-Plaintiff Telebrands Corp., hereby stipulate and
3 request that the Court modify its Scheduling Order to include a rebuttal expert disclosure deadline
4 pursuant Rule 26(a)(2)(D)(ii) of the Federal Rules of Civil Procedure.

5
6 The Court issued its Scheduling Order on May 31, 2012, and ordered that the parties serve
7 upon all other parties by November 30, 2012 a final list of the names of all experts that they
8 propose to tender at trial and the experts' written reports. Scheduling Order at 5 [Dkt. No. 39].
9 The Scheduling Order, however, does not include a rebuttal expert disclosure deadline, pursuant
10 to Rule 26(a)(2)(D)(ii) of the Federal Rules of Civil Procedure.

11 The parties have conferred and agreed to request that the Scheduling Order be amended as
12 follows:

13
14 On or before January 7, 2013, all counsel are to designate in writing and file with the court
15 and serve upon all other parties a final list of the names of all rebuttal experts that they propose to
16 tender at trial. At the time of designation, all rebuttal experts shall submit a written report. The
17 contents of the report must comply with Federal Rule of Civil Procedure 26 (a)(2)(B). All rebuttal
18 experts so designated are to be fully prepared to render an informed opinion at the time of
19 designation so that they may fully participate in any deposition taken by the opposing party.

20
21 WHEREFORE, in light of the foregoing, the parties respectfully request that the Court
22 modify the current case management schedule embodied in its May 31, 2012 Scheduling Order to
23 include a rebuttal expert disclosure deadline of January 7, 2013.

1 Respectfully submitted,

2 By /s/ R. David Donoghue
3 **Dated: November 05, 2012**

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17 *Counsel for Plaintiff and Counter-Defendant*

18 By: /s/ Robert. T. Maldonado
19 **Dated: November 05, 2012**


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Counsel for Defendant

So Ordered:

Date: November 7, 2012


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT