ROGER A. DREYER, ESQ. / SBN: 095462 1 STANLEY P. FLESHMAN, ESQ. / SBN: 061133 2 DREYER BABICH BUCCOLA WOOD CAMPORA, LLP 20 Bicentennial Circle Sacramento, CA 95826 3 Telephone: (916) 379-3500 4 Facsimile: (916) 379-3599 5 Attorneys for Plaintiffs 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 Case No.: 2:11-CV-03301-JAM-DAD MEGAN REGER, individually, and as Successor in Interest to Clinton Reger, 12 deceased; KEVIN EIKLEBERRY as Guardian Ad Litem for EVAN REGER and 13 MATTHEW REGER, minors, 14 Plaintiffs, JOINT STIPULATION AND MOTION TO EXTEND TIME TO SUBMIT JOINT 15 ٧. STATUS REPORT 16 MOUNTAIN LIFEFLIGHT INC.; AMERICAN EUROCOPTER LLC; LYCOMING ENGINES; 17 TEXTRON INC.; AVCO INC.; HONEYWELL INTERNATIONAL COMPANY; TURBOMECA 18 USA: TURBOMECA ENGINE CORPORATION and DOES 1 through 80, 19 Defendants. 20 Pursuant to the Order Requiring Joint Status Report filed on December 12, 2011 21 (Dkt. 5), the date to file the Joint Status Report appears to be February 7, 2012. The parties 22 through their respective counsel have stipulated to an order to extend the date for filing of the 23 Joint Status Report and request that the court so order an extension of time for filing of the 24 Joint Status Report. 25 The parties respectfully submit that good cause exists for the extension of time to file 26 the Joint Status Report. This matter was removed from the California Superior Court in and for 27 the County of Sacramento. There is currently a motion to remand pending, with a hearing on 28 -1-Joint Stipulation and Motion

that motion set for March 7, 2012. (Dkt. 17.) Plaintiffs anticipate filing an additional motion to remand shortly. Additionally, the court ordered this matter related to *Ritz v. Mountain Lifeflight Inc et al.*, 2:12-CV-00134-KJM-CKD. (Dkt. 21.) That action likewise was removed from the California Superior Court in and for the County of Sacramento. It is anticipated that the plaintiffs in the *Ritz* case will file a motion to remand that action as well.

During the meet and confer process on the Joint Status Report, counsel stipulated to this request to the court to continue the date for submission of the Joint Status Report to an appropriate time following determination of motions to remand to state court. Should this action be remanded to state court, it will proceed there and the proceedings in this court will cease and the submission of a Joint Status Report will not be necessary.

Therefore the parties move the court Pursuant to Local Rules 143(a) and (b) and 144(a) and any other applicable provision of the Local Rules for an order extending the time to submit the Joint Status Report to thirty (30) days from resolution of the issue of remand to the state court or such other date as the court deems appropriate.

IT IS HEREBY STIPULATED by and between the parties to the above-captioned action as follows:

That a Joint Status Report shall be filed within thirty (30) days of resolution of the pending motion to remand or such other date as the court deems appropriate.

DATED: February 3, 2012 DREYER BABICH BUCCOLA WOOD CAMPORA, LLP

By: /s/ Roger Dreyer

ROGER A. DREYER

Attorneys for Plaintiffs

DATED: February 3, 2012 NIXON PEABODY, LLP

By: /s/ Paul E. Stinson
PAUL E. STINSON
Attorneys for Defendant,
AMERICAN EUROCOPTER CORPORATION

Joint Stipulation and Motion

1	DATED: February 3, 2012 PERKINS	S COIE LLP	
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3		/ Joshua Reiten OSHUA REITEN	
4	4 At	torneys for Defendants, ONEYWELL INTERNATIONAL INC., TEXTRON	
5	5 IN	IC., AVCO CORPORATION, and LYCOMING	
6		1011120	
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8	8 DATED: February 3, 2012 CODDIN	GTON, HICKS & DANFORTH	
9	Э		
10	RA	/ Randolph S. Hicks ANDOLPH S. HICKS	
11	M	torneys for Defendant, OUNTAIN LIFEFLIGHT, INC.	
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15	17.10.00 ODD 5050 11	the ission of the Joint Status Danort he extended	
16		IT IS SO ORDERED that the time for submission of the Joint Status Report be extended to within thirty (30) days of resolution of the pending motion to remand.	
17		bending motion to remain.	
18 19		/s/ John A. Mendez	
20		U.S. DISTRICT COURT JUDGE	
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