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

14 ADVANCED STEEL RECOVERY, LLC,  
15 Plaintiff,  
16 vs.  
17 X-BODY EQUIPMENT, INC. and JEWELL  
18 ATTACHMENTS, LLC,  
19 Defendants.  
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) Case No. 2:12-cv-01004-GEB-DAD  
)  
) [Hon. Garland E. Burrell, Jr.]  
)  
)

**JOINT STIPULATION TO EXTEND  
EXPERT DISCLOSURE DEADLINES**

AND RELATED COUNTERCLAIMS  
\_\_\_\_\_

1                   **JOINT STIPULATION TO EXTEND EXPERT DISCLOSURE DEADLINES**

2                   WHEREAS, the Court has set the following expert discovery deadlines in the case,  
3 including initial expert disclosures on August 16, 2014 and rebuttal expert disclosures on  
4 September 16, 2014 (see, Docket No. 51);

5                   WHEREAS, the fact discovery cut-off and expert discovery cut-off dates in the case are  
6 set for January 15, 2015 and February 16, 2015, respectively (see, Docket No. 51);

7                   WHEREAS, the last date for hearing motions in the case is set for March 16, 2015 (see,  
8 Docket No. 51);

9                   WHEREAS, because there remains a significant amount of fact discovery to conduct in  
10 the case, including party depositions, and in light of Defendants’ pending motion for summary  
11 judgment, the parties seek to extend the expert disclosure deadlines by approximately sixty (60)  
12 days so that the additional fact discovery and depositions can be conducted before the expert  
13 disclosures must be provided;

14                   WHEREAS, the parties propose to extend the initial expert disclosure date from August  
15 16, 2014 to October 10, 2014, and the rebuttal expert disclosure date from September 16, 2014 to  
16 November 14, 2014;

17                   WHEREAS, the parties’ requested modification of the expert disclosure deadlines will not  
18 alter the fact or expert discovery cut-off dates, the motion deadline, the trial preparation  
19 deadlines, the pretrial conference, or the trial date.

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1 NOW THEREFORE, the parties, by and through their counsel of record, hereby stipulate  
2 and agree to move the deadline for initial expert reports from August 16, 2014 to October 10,  
3 2014, and the deadline for rebuttal expert reports from September 16, 2014 to November 14,  
4 2014.

6 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

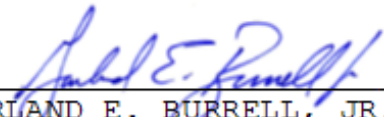
<p>8 <b>CISLO &amp; THOMAS LLP</b></p> <p>9 /s/ Mark D. Nielsen</p> <p>10 Daniel M. Cislo</p> <p>11 Mark D. Nielsen</p> <p>12 <b>GIBSON, DUNN &amp; CRUTCHER, LLP</b></p> <p>13 Wayne M. Barsky</p> <p>14 Jennifer Rho</p> <p>15 Casey J. McCracken</p> <p>16 Attorneys for Plaintiff, ADVANCED STEEL RECOVERY, LLC</p> <p>17 Dated: June 26, 2014</p>	<p>8 <b>SEDGWICK LLP</b></p> <p>9 /s/ Robert M. Harkins, Jr. (with permission)</p> <p>10 Robert M. Harkins, Jr.</p> <p>11 Matthew A. Fischer</p> <p>12 Jennifer Ming</p> <p>13 Attorneys for Defendants, X-BODY EQUIPMENT, INC. and 14 JEWELL ATTACHMENTS LLC</p> <p>15 Dated: June 26, 2014</p>
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18 **ORDER**

19 Based on the parties' stipulation submitted concurrently herewith,  
20 IT IS HEREBY ORDERED THAT the deadline for initial expert disclosures shall be extended  
21 from August 16, 2014 to October 10, 2014, and the deadline for rebuttal expert disclosures shall  
22 be extended from September 16, 2014 to November 14, 2014.

23 **IT IS SO ORDERED.**

24 Dated: June 26, 2014

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GARLAND E. BURRELL, JR.  
28 Senior United States District Judge

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**PROOF OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of June, 2014, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system with electronic notification of such filing to the following counsel of record:

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Executed on June 26, 2014, at Westlake Village, California.

/s/ Laura Banuelos  
Laura Banuelos