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16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**
18

19 GCUBE INSURANCE SERVICES,
INC., a California corporation,

20 Plaintiff,

21 v.
22

23 LINDSAY CORPORATION, a
Delaware corporation, and DOES 1
through 10, inclusive,

24 Defendants.
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CASE NO. 2:12-01163

**STIPULATION AND [PROPOSED]
ORDER TO STRIKE PRAYER FOR
PUNITIVE DAMAGES FROM
PLAINTIFF GCUBE INSURANCE
SERVICES, INC.'S COMPLAINT**

Trial Date: May 6, 2014

1 Plaintiff GCUBE INSURANCE SERVICES, INC. and Defendant LINDSAY
2 CORPORATION, by and through their respective counsel of record, hereby
3 stipulate and agree to strike all allegations of exemplary and punitive damages set
4 forth in Plaintiff GCUBE INSURANCE SERVICES, INC.'s operative complaint
5 against Defendant LINDSAY CORPORATION, specifically paragraphs 34-35, and
6 Prayer for Relief on page 8:22, which states "For exemplary and punitive damages."
7 The parties agree that this stipulation may be signed in counterparts and agree to this
8 stipulation by original facsimile, or electronic signatures.
9

10 DATED: February 18, 2014 SCHAFFER, LAX, McNAUGHTON & CHEN
A Professional Corporation

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14 BY: /s/ Yaron F. Dunkel
15 KEVIN J. McNAUGHTON
16 JILL A. FRANKLIN
17 YARON F. DUNKEL
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18 CORPORATION

19 DATED: February 18, 2014 STOEL RIVES LLP

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23 BY: /s/ Jonathan A. Miles
24 (as authorized on 2/18/14)
25 EDWARD C. DUCKERS
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ORDER

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The parties having so stipulated, IT IS ORDERED that all allegations of exemplary and punitive damages set forth in Plaintiff GCUBE INSURANCE SERVICES, INC.'s operative complaint against Defendant LINDSAY CORPORATION, specifically paragraphs 34-35, and Prayer for Relief on page 8:22, which states "For exemplary and punitive damages", are hereby stricken.

IT IS SO ORDERED.

Dated: February 20, 2014



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE