

(SPACE BELOW FOR FILING STAMP ONLY)

1 STEPHANIE L. QUINN (SBN 216655)
 2 MARIEL COVARRUBIAS (SBN 274784)
 3 **MURPHY, CAMPBELL, ALLISTON & QUINN**
 8801 Folsom Boulevard, Suite 230
 4 Sacramento, CA 95826
 Telephone: (916) 400-2300
 Fax: (916) 400-2311
 5 Email: squinn@murphycampbell.com
mcovarrubias@murphycampbell.com

6 Attorneys for Defendant
 7 UNION PACIFIC RAILROAD COMPANY

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

10 BURLEY D. TOMPKINS,
 11 Plaintiff,
 12 vs.
 13 UNION PACIFIC RAILROAD COMPANY, a
 14 corporation,
 15 Defendants.

Case No. 2:12-CV-01481-JAM-GGH

**STIPULATION OF THE PARTIES FOR
 ADDITIONAL INTERROGATORIES
 PURSUANT TO FEDERAL RULE OF
 CIVIL PROCEDURE, RULE 29 AND
 [PROPOSED] ORDER**

STIPULATION OF THE PARTIES FOR ADDITIONAL INTERROGATORIES

17 Defendant UNION PACIFIC RAILROAD COMPANY (UPRR) and Plaintiff BURLEY
 18 D. TOMPKINS ("Plaintiff") herein collectively referred to as the parties, by and through their
 19 attorneys of record, hereby stipulate to extend the discovery limitation pursuant to Rule 29
 20 of the Federal Rule of Civil Procedure. Due to the various claims of Plaintiff and the multiple
 21 incidents at issue which span a time period of over sixteen years, the parties stipulate that a
 22 total of sixty (60) interrogatories will be allotted to each party throughout the course of
 23 discovery. The parties will assess whether additional discovery is necessary as the matter
 24 progresses.

25 //
 26 //
 27 //
 28 //

MURPHY, CAMPBELL, ALLISTON & QUINN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: July 24, 2014

MURPHY, CAMPBELL, ALLISTON & QUINN

By: /s/ MARIEL COVARRUBIAS
STEPHANIE L. QUINN SBN 216655
MARIELCOVARRUBIAS SBN 274784
Attorney for Defendant UNION PACIFIC
RAILROAD COMPANY

DATED: July 24, 2014

HILDEBRAND, McLEOD & NELSON, INC.

By: /s/ RYAN J. OTIS
ANTHONY S. PETRU SBN 91399
RYAN J. OTIS SBN 260032
Attorney for Plaintiff BURLEY D. TOMPKINS

IT IS SO ORDERED:

Dated: August 8, 2014


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE