I     DONALD P. EICHHORN (SBN 139863) Email: Donald Eichhorn(2)wilsonelser.com       2     WILSON ELSER MOSKOWITZ FDE/LMAN & DICKER I.LP S25 Markel Street, 17 <sup>8</sup> Floor San Franciso, California 94105 Telephone: (415) 433-0990 Facsimile: (415) 433-0990 Facsimile: (415) 433-0990 Facsimile: (415) 433-170       3     Attorneys for Defendants GENERAL ELECTRIC COMPANY and SAMSUNG ELECTRONICS AMERICA, INC.       8     9       9     UNITED STATES DISTRICT COURT       10     EASTERN DISTRICT OF CALIFORNIA       11     MID-CENTURY INSURANCE COMPANY, and AMICA MUTUAL INSURANCE       12     MID-CENTURY INSURANCE COMPANY, and AMICA MUTUAL INSURANCE       13     COMPANY,       14     Plaintiffs,       15     v.       16     GENERAL ELECTRIC COMPANY; SAMSUNG ELECTRONICS AMERICA, INC.; and DOES 1 through 10, inclusive, and DOES 1 thro				
2       WILSON ELSER MOSKOWITZ FUPEIMAN& & DICKER ILP 325 Market Street, 17 <sup>th</sup> Floor San Francisco, California 94105 Telephone: (415) 433-0990 Facsimile: (415) 433-0990 Facsimile: (415) 433-0990 Facsimile: (415) 434-1370         4       Telephone: (415) 433-0990 Facsimile: (415) 434-1370         5       Attorneys for Defendants GENERAL ELECTRIC COMPANY and SAMSUNG ELECTRONICS AMERICA, INC.         8       9         9       UNITED STATES DISTRICT COURT         10       EASTERN DISTRICT OF CALIFORNIA         11       EASTERN DISTRICT OF CALIFORNIA         12       MID-CENTURY INSURANCE COMPANY, and AMICA MUTUAL INSURANCE COMPANY,       Case No.: 2:13-CV-00225-MCE-AC and AMICA MUTUAL INSURANCE         13       COMPANY,       STIPULATION AND ORDER TO EXTEND DISCOVERY         14       Plaintifts,       COMPLETION DATE         15       v.       )         16       GENERAL ELECTRIC COMPANY; SAMSUNG ELECTRONICS AMERICA, INC.; and DOES 1 through 10, inclusive,       )         19	1	DONALD P. EICHHORN (SBN 139863)		
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4       Telephone: (415) 433-0990         5       Facsimile: (415) 434-1370         5       Attorneys for Defendants         6       GENERAL ELECTROIC COMPANY and         7       SAMSUNG ELECTRONICS AMERICA, INC.         8       UNITED STATES DISTRICT COURT         10       EASTERN DISTRICT OF CALIFORNIA         11       MID-CENTURY INSURANCE COMPANY, ) Case No.: 2:13-CV-00225-MCE-AC and AMICA MUTUAL INSURANCE COMPANY, ) ORDER TO EXTEND DISCOVERY COMPLETION AND ONDER TO EXTEND DISCOVERY (COMPANY, ) ORDER TO EXTEND DISCOVERY (COMPANY, ) ORDER TO EXTEND DISCOVERY (COMPLETION DATE         15       v.         16       GENERAL ELECTRIC COMPANY; And DOES 1 through 10, inclusive, and DOES 1 through 10, incluse and the attract the partie	3	525 Market Street, 17 <sup>th</sup> Floor		
5       Attorneys for Defendants GENERAL ELECTRIC COMPANY and         7       SAMSUNG ELECTRONICS AMERICA, INC.         8       0         9       UNITED STATES DISTRICT COURT         10       EASTERN DISTRICT OF CALIFORNIA         11       MID-CENTURY INSURANCE COMPANY, and AMICA MUTUAL. INSURANCE COMPANY, COMPANY, 0       Case No.: 2:13-CV-00225-MCE-AC         13       OCMPANY, 0       STIPULATION AND 0RDER TO EXTEND DISCOVERY COMPANY, 0         14       Plaintiffs, 0       0         15       v.       0         16       GENERAL ELECTRIC COMPANY; SAMSUNG ELECTRONICS AMERICA, INC.; and DOES 1 through 10, inclusive, 0       0         19       Defendants.       0         19       Defendants.       0         10       Samsung ELECTRONICS AMERICA, INC.; and DOES 1 through 10, inclusive, 0       0         10       WHEREAS non-expert discovery is scheduled to be completed on May 2, 2014 per the Pre         11       Trial Scheduling Order dated August 27, 2013.       0         20       WHEREAS the parties agree that an additional 90 days is needed to complete pending non-         21       Trial Scheduling Order dated August 27, 2013.       0         22       WHEREAS a discovery dispute has arisen in this matter which the parties are attempting to resolve informally and with the assistance of Mag	4	Telephone: (415) 433-0990		
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7       8         9       UNITED STATES DISTRICT COURT         10       EASTERN DISTRICT OF CALIFORNIA         11       EASTERN DISTRICT OF CALIFORNIA         12       MID-CENTURY INSURANCE COMPANY, and AMICA MUTUAL INSURANCE         13       COMPANY, ORDER TO EXTEND DISCOVERY COMPLETION AND ORDER TO EXTEND DISCOVERY COMPLETION DATE         14       Plaintiffs, COMPLANY; SAMSUNG ELECTRIC COMPANY; SAMSUNG ELECTRONICS AMERICA, INC.; and DOES 1 through 10, inclusive, Defendants.         19       Defendants.         10       WHEREAS non-expert discovery is scheduled to be completed on May 2, 2014 per the Pre         11       Trial Scheduling Order dated August 27, 2013.         20       WHEREAS the parties agree that an additional 90 days is needed to complete pending non-expert discovery dispute has arisen in this matter which the parties are attempting to         21       Trial Scheduling Order dated August 27, 2013.         22       WHEREAS the parties agree that an additional 90 days is needed to complete pending non-expert discovery.         24       WHEREAS a discovery dispute has arisen in this matter which the parties are attempting to         25       resolve informally and with the assistance of Magistrate Judge Allison Claire.         26       WHEREAS on April 25, 2014 an I	6	GENERAL ELECTRIC COMPANY and		
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1	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between		
2	Plaintiff and Defendants through their attorneys of record that the non expert-discovery completion		
3	date set in the Pretrial Scheduling Order of August 27, 2013 be continued as outlined above, or as		
4	the Court deems appropriate.		
5	IT IS SO STIPULATED.		
6	DATED: May 7, 2014 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP		
7	EDELWAN & DICKER, EEI		
8	By: <u>/s/ Donald P. Eichhorn</u> Donald P. Eichhorn		
9	Attorneys for Defendant General Electric Company		
10	Company		
11	DATED: May 7, 2014 ALPER & McCULLOCH		
12	By: /s/ Dean A. Alper		
13	Dean A. Alper Attorney for Plaintiffs Mid-Century Insurance		
14	Company and Amica Mutual Insurance Company		
15			
16	ORDER In accordance with the above stipulation and agreement of the parties, and good cause		
17			
18	appearing, non-expert discovery shall close ninety (90) days from May 2, 2014, on <b>July 31, 2014</b> .		
19	IT IS SO ORDERED. DATED: MAY 13, 2014 Malan May 13, 2014		
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22			
23	MORRISON C. ENGLAND, JR., CHIEF JUDGE UNITED STATES DISTRICT COURT		
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	STIPULATION & PROPOSED ORDER TO EXTEND DISCOVERY COMPLETION DATE 1208275v.1		