Sean Gavin, (SBN: 251124) 1 FOOS GAVIN LAW FIRM, P.C. 3947 Lennane Drive, Suite 120 2 Sacramento, California 95834 3 T: 916.779.3500 F: 916.779.3508 4 E: sean@foosgavinlaw.com 5 Attorneys for Plaintiffs 6 SACRAMENTO E.D.M., INC. and DAN FOLK 7 8 IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA 9 Case No.: 2:13-CV-00288-MCE-KJN SACRAMENTO E.D.M., INC., a 10 California corporation; DAN FOLK, an 11 individual, STIPULATION TO EXTEND TIME TO **DEPOSE DEFENDANTS;** 12 Plaintiffs, **ORDER** 13 V. 14 HYNES AVIATION INDUSTRIES. 15 INC. dba HYNES AVIATION SERVICES, an Oklahoma corporation; 16 HYNES CHILDREN TF LIMITED, a 17 business entity, form unknown; MICHAEL K. HYNES, an individual; 18 and DOES 1 through 50, inclusive; 19 Defendant. 20 21 Plaintiffs, SACRAMENTO E.D.M., INC. and DAN FOLK ("Plaintiffs"), and 22 Defendants, HYNES AVIATION INDUSTRIES, INC. dba HYNES AVIATION 23 SERVICES, an Oklahoma corporation; HYNES CHILDREN TF LIMITED, a business 24 entity, form unknown; MICHAEL K. HYNES ("Defendants"), by and through their 25 respective counsel, hereby agree, subject to the Court's approval, to extend the time for 26 Plaintiff to depose Defendant MICHAEL K. HYNES and any person Defendants would 27 designate as the Person Most Knowledgeable about the transactions and events that are 28 the subject of this litigation. By stipulation of the parties' counsel, the deadline for Sacramento E.D.M., Inc., et al. v. Hynes Aviation Industries, Inc., et al. Page 1 of 3 Stipulation to Extend Time to Depose Defendants; Order

1	Plaintiff to depose MICHAEL K. HYNES and Defendants' Person Most Knowledgeabl	
2	will now be Friday, August 29, 2014. This extension is necessary to give Plaintiffs'	
3	counsel an opportunity to travel to Missouri for the deposition(s) and to ensure that, in	
4	light of Defendants' recent Motion for Leave to File Counter-Claim (Docket # 35), the	
5	parties and counsel have adequate opportunity to examine the witness(es) on all relevan	
6	topics. Defendants agree that this request is reasonable.	
7	This stipulation is made and entered into pursuant to the Federal Rules of	
8	Civil Procedure, Rule 29(b). This stipulation will not interfere with the time set for	
9	completing any other discovery, for hearing a motion, or for trial. Nothing in this	
10	stipulation is intended to abridge or extend any obligations or responsibilities	
11	articulated in Federal Rules of Civil Procedure, Rule 30.	
12		
13		Respectfully Submitted,
14		Foos Gavin Law Firm, P.C.
15	Date: June 27, 2014	/s/ Sean Gavin
16	,	Sean Gavin (SBN: 251124)
17		Attorney for Plaintiffs, SACRAMENTO E.D.M., INC. and DAN FOLK
18		,
19		BARTH DALY LLP
20	D. 4 1 27 2014	/ / TTI
21	Date: June 27, 2014	/s/ Thomas Barth THOMAS W. BARTH (SBN: 154075)
22		Attorneys for Defendants,
23		HYNES AVIATION INDUSTRIES, INC.; HYNES CHILDREN TF LIMITED; and MICHAEL K.
24		HYNES
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## **ORDER**

Pursuant to the parties' stipulation, ECF No. 47, and as set forth above, the deadline for Plaintiff to depose Michael K. Hynes and Defendants' person most knowledgeable will now be Friday, August 29, 2014.

IT IS SO ORDERED.

Dated: July 22, 2014

MORRISON C. ENGLAND, JR., CHIEF JUDGE UNITED STATES DISTRICT COURT