1	Thomas W. Barth, SBN 154075		
2	BARTH DALY LLP 431 I Street, Suite 201		
3	Sacramento, California 95814 Telephone: (916) 440-8600		
4	Facsimile: (916) 440-9610		
5	Attorneys for HYNES AVIATION INDUSTRIES, INC., HYNES CHILDREN TF		
6	LIMITED and MICHAEL HYNES		
7	UNITED STATES DISTRICT COURT		
8	EASTERN DISTRICT OF CALIFORNIA		
9			
10	SACRAMENTO E.D.M., INC., a California	Case No. 2:13-CV-00288-MCE-KJN	
11	corporation; DAN FOLK, an individual,		
12	Plaintiffs,	STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO	
13	V.	DISCOVERY; ORDER	
14	HYNES AVIATION INDUSTRIES, INC. dba HYNES AVIATION SERVICES, an Oklahoma corporation; HYNES		
15	CHILDREN TF LIMITED, a business entity, form unknown; MICHAEL K.		
16	HYNES, an individual; and DOES 1 through 50, inclusive,		
17	Defendants.		
18			
19	Plaintiffs Sacramento E.D.M., Inc., and Dan Folk ("plaintiffs") and defendants		
20	Hynes Aviation Industries, Inc. dba Hynes Aviation Services, Hynes Children TF Limited and		
21	Michael K. Hynes ("defendants"), by and through their respective counsel, hereby agree, subject		
22	to the Court's approval, to extend the time for defendants to respond to the following discovery,		
23	propounded by plaintiffs:		
24		ogatories, Set One (directed to Hynes Aviation	
25	Industries, Inc.);		
26		ogatories, Set One (directed to Hynes Children TF	
27	Limited);	agatarias Sat One (directed to Michael V. Herre)	
28		ogatories, Set One (directed to Michael K. Hynes);	
	{00013049} STIPULATION TO EXTEND TIME TO RESPOND TO DISCOVE	- 1 - RY; ORDER (2:13-CV-00288-MCE-KJN)	
		<u> </u>	

1	4. Plaintiffs' Request for Production of Documents, Set One (directed		
2	to Hynes Aviation Industries, Inc.);		
3	5. Plaintiffs' Request for Production of Documents, Set One (directed		
4	to Hynes Children TF Limited); and		
5	6. Plaintiffs' Request for Production of Documents, Set One (directed		
6	to Michael K. Hynes).		
7	By stipulation of the parties' counsel, the deadline for the completion of the		
8	discovery will now be Monday, July 28, 2014. This extension is necessary to give defendants'		
9	counsel an opportunity to obtain the necessary information and documents for responses to the		
10	written discovery. Plaintiffs agree that this request is reasonable.		
11	This stipulation is made and entered into pursuant to the Federal Rules of Civil		
12	Procedure, Rule 29(b). This stipulation will not interfere with the time set for completing any		
13	other discovery, for hearing a motion, or for trial. Nothing in this stipulation is intended to		
14	abridge or extend any obligations or responsibilities articulated in Federal Rules of Civil		
15	Procedure, Rule 30.		
16	Dated: July 14, 2014. Respectfully submitted,		
17	BARTH DALY LLP		
18			
19	By /s/Thomas W. Barth THOMAS W. BARTH (SBN 154075)		
20	Attorneys for Defendants HYNES AVIATION		
21	INDUSTRIES, INC., HYNES CHILDREN TF LIMITED and MICHAEL HYNES		
22	ENVITED WIN WHOM REE TITYES		
23			
24			
25			
26			
27			
28	_		
	{00013049} - 2 -		

1		S GAVIN LAW FIRM, P.C.
2		
3	7	/s/ Sean Gavin SEAN GAVIN (SBN 251124)
5	Attor	neys for Plaintiffs SACRAMENTO M., INC., and DAN FOLK
		VI., INC., and DAN FOLK
6 7		
8		
9		<u>ORDER</u>
10		
11	Pursuant to the parties' stipulation,	IT IS SO ORDERED.
12		
13		In all the
14	4 MOR	RISON C. ENGLAND, JR., CHIEF JUDGE
15	5 UNIT	ED STATES DISTRICT COURT
16	5	
17	7	
18	3	
19	)	
20	)	
21		
22	2	
23	3	
24	1	
25		
26		
27		
28		2
	{00013049}	- 3 -