

1 Sean Gavin, (SBN: 251124)
 2 FOOS GAVIN LAW FIRM, P.C.
 3 3947 Lennane Drive, Suite 120
 4 Sacramento, California 95834
 5 T: 916.779.3500
 6 F: 916.779.3508
 7 E: sean@foosgavinlaw.com

8 Attorneys for Plaintiffs
 9 SACRAMENTO E.D.M., INC. and
 10 DAN FOLK

11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE EASTERN DISTRICT OF CALIFORNIA

13 SACRAMENTO E.D.M., INC., a
 14 California corporation; DAN FOLK, an
 15 individual,

16 Plaintiffs,

17 v.

18 HYNES AVIATION INDUSTRIES,
 19 INC. dba HYNES AVIATION
 20 SERVICES, an Oklahoma corporation;
 21 HYNES CHILDREN TF LIMITED, a
 22 business entity, form unknown;
 23 MICHAEL K. HYNES, an individual;
 24 and DOES 1 through 50, inclusive;

25 Defendant.

Case No.: 2:13-CV-00288-MCE-KJN

**STIPULATION TO EXTEND TIME TO
 DEPOSE DEFENDANTS;
 ORDER**

[2nd Request]

26 WHEREAS, the Court's original Pretrial Scheduling Order in this matter (Docket
 27 #34) dictated a discovery cutoff date of July 15, 2014; and

28 WHEREAS, on July 13, 2014 the Parties submitted a Stipulation to Extend Time
 to Depose Defendants (see Docket #47), which this Court signed on July 24, 2014 (see
 Docket #58) setting the new deadline to conduct Defendants' depositions as August 29,
 2014; and

WHEREAS, Plaintiffs scheduled Defendants' depositions for August 13, 2014 and
 August 14, 2014 by deposition notices served on July 22 and July 23, 2014; and

1 WHEREAS, on August 12, 2014, Defendants filed a Motion for Protective Order
2 to require that Defendants' depositions be taken in Missouri (see Docket #63); and

3 WHEREAS, as a result of their requested Protective Order, Defendants did not
4 appear on the days scheduled for their depositions; and

5 WHEREAS, the hearing on Defendants' Motion for Protective Order is not
6 scheduled to take place until September 4, 2014;

7 NOW THEREFORE, Plaintiffs, SACRAMENTO E.D.M., INC. and DAN FOLK
8 ("Plaintiffs"), and Defendants, HYNES AVIATION INDUSTRIES, INC. dba HYNES
9 AVIATION SERVICES, an Oklahoma corporation; HYNES CHILDREN TF LIMITED,
10 a business entity, form unknown; MICHAEL K. HYNES ("Defendants"), by and through
11 their respective counsel, hereby agree, subject to the Court's approval, to extend the time
12 for Plaintiff to depose Defendant MICHAEL K. HYNES and Defendant HYNES
13 AVIATION INDUSTRIES, INC.'s Person Most Knowledgeable about the subjects
14 identified in the deposition notices originally served on July 22 and July 23, 2014. By
15 stipulation of the parties' counsel, the deadline for Plaintiff to depose MICHAEL K.
16 HYNES and Defendant HYNES AVIATION INDUSTRIES, INC.'s Person Most
17 Knowledgeable about the subjects identified in the deposition notices originally served on
18 July 22 and July 23, 2014 will now be Friday, October 17, 2014.

19 This extension is necessary to give Plaintiffs' counsel an opportunity to travel to
20 Missouri for the deposition(s) (or to give Defendants an opportunity to travel to
21 Sacramento, depending on the Court's ruling on Defendants' Motion for Protective Order
22 [Docket # 63]). Defendants agree that this request is reasonable.

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1 This stipulation is made and entered into pursuant to the Federal Rules of
2 Civil Procedure, Rule 29(b). This stipulation will not interfere with the time set for
3 completing any other discovery, for hearing a motion, or for trial. Nothing in this
4 stipulation is intended to abridge or extend any obligations or responsibilities
5 articulated in Federal Rules of Civil Procedure, Rule 30.

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7 Respectfully Submitted,

8 FOOS GAVIN LAW FIRM, P.C.

9 Date: August 29, 2014

/s/ Sean Gavin

10 Sean Gavin (SBN: 251124)

11 Attorney for Plaintiffs,

12 SACRAMENTO E.D.M., INC. and DAN FOLK

13 BARTH DALY LLP

14 Date: August 29, 2014

/s/ Thomas Barth

15 THOMAS W. BARTH (SBN: 154075)

16 Attorneys for Defendants,

17 HYNES AVIATION INDUSTRIES, INC.; HYNES

18 CHILDREN TF LIMITED; and MICHAEL K.

HYNES

19 **ORDER**

20 IT IS SO ORDERED.

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22 Dated: September 3, 2014

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