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10 TAT TOHUMCULUK A. S.

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

13 TAT TOHUMCULUK A. S., a Turkish  
14 Company,

15 Plaintiff,

16 v.

17 H.J. HEINZ COMPANY, L.P. a Pennsylvania  
18 Limited Partnership registered to do business  
19 in California, and HEINZSEED, an  
20 unincorporated division of H.J. HEINZ  
21 COMPANY, L.P.,

22 Defendants.

Case No: 2:13-CV-00773-WBS-KJN

**STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE DISCOVERY DEADLINES**

23 Plaintiffs TAT Tohumculuk A.S. ("Plaintiff") and Defendants H.J. Heinz Company, L.P.,  
24 and Heinzseed, an unincorporated division of H.J. Heinz Company, L.P. (collectively,  
25 "Defendants") (collectively, the "Parties") hereby submit, through their undersigned counsel of  
26 record, the following Stipulation and Proposed Order:

27 WHEREAS, on January 15, 2014, this Court entered its Status (Pretrial Scheduling)  
28 Order<sup>1</sup> (the "Scheduling Order") which set forth, among other things, discovery and motion  
deadlines in the above referenced matter;

WHEREAS, the Parties previously postponed overseas depositions in order to conduct  
informal settlement discussions which were not successful;

<sup>1</sup> ECF No. 41.

1 WHEREAS, the Parties wish to extend those deadlines set forth in the Scheduling  
2 Order as follows, in order to allow additional time for the parties to conduct depositions in  
3 foreign countries which require extensive time to schedule and coordinate;

<b>Deadline for:</b>	<b>Currently Scheduled Deadline:</b>	<b>Proposed Rescheduled Deadline</b>
Non-Expert Discovery Closes	September 30, 2014	November 14, 2014
Last Day to Disclose Experts and Produce Expert Reports	October 31, 2014	December 15, 2014
Last Day to Disclose Rebuttal Experts and Produce Expert Rebuttal Reports	November 30, 2014	January 15, 2015
Expert Discovery Closes	December 31, 2014	February 13, 2015
Last Day to File Motions, Except for Continuances, Temporary Restraining Orders, or Other Emergency Applications	December 31, 2014	February 13, 2015

17 THEREFORE, IT IS HEREBY STIPULATED between counsel for Defendants and  
18 counsel for Plaintiff that the discovery and motion deadlines set forth in the Scheduling Order  
19 be rescheduled as set forth above.

20 SO STIPULATED.

21 Dated: June 24, 2014

ANASTASSIOU & ASSOCIATES

22 By: /s/ Effie F. Anastassiou  
23 Effie F. Anastassiou, Esq.  
24 Attorneys for Plaintiff,  
25 TAT TOHUMCULUK A. S.

1 Dated: June 24, 2014

REED SMITH LLP

2 By: /s/ David S. Reidy  
3 David S. Reidy, Esq.  
4 Attorneys for Defendants,  
5 H. J. HEINZ COMPANY L.P., erroneously sued  
6 as "H. J. Heinz Company" and HEINZSEED,  
7 an unincorporated division of H.J. HEINZ  
8 COMPANY, L.P.

9 **[PROPOSED] ORDER**

10 Appearing that good cause exists pursuant to the foregoing stipulation of the Parties, IT  
11 IS HEREBY ORDERED that the deadlines for discovery and motions set forth in the Status  
12 (Pretrial Scheduling) Order, are rescheduled as follows:

13 <b>Deadline for:</b>	14 <b>Currently Scheduled Deadline:</b>	15 <b>Proposed Rescheduled Deadline</b>
16 Non-Expert Discovery Closes	17 September 30, 2014	18 November 14, 2014
19 Last Day to Disclose Experts and Produce Expert Reports	20 October 31, 2014	21 December 15, 2014
22 Last Day to Disclose Rebuttal Experts and Produce Expert Rebuttal Reports	23 November 30, 2014	24 January 15, 2015
25 Expert Discovery Closes	26 December 31, 2014	27 February 13, 2015
28 Last Day to File Motions, Except for Continuances, Temporary Restraining Orders, or Other Emergency Applications	29 December 31, 2014	30 February 13, 2015

31 SO ORDERED.

32 Dated: July 18, 2014

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34 \_\_\_\_\_  
35 KENDALL J. NEWMAN  
36 UNITED STATES MAGISTRATE JUDGE