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Attorneys for Defendants
SPRINT SOLUTIONS, INC. and
NEXTEL OF CALIFORNIA, INC.
[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

CITY OF LOS ANGELES, *ex rel.* RICHARD
KNUDSEN,

Plaintiffs,

vs.

SPRINT SOLUTIONS, INC.; NEXTEL OF
CALIFORNIA, INC., D/B/A NEXTEL
COMMUNICATIONS AND SPRINT
NEXTEL; and DOES 1-10,

Defendants.

Case No. 2:17-cv-00811-TLN-AC

**STIPULATION AND ORDER
MODIFYING PRETRIAL
SCHEDULING ORDER**

Judge: Hon. Troy L. Nunley
Courtroom: 2, 15th Floor

Trial Date: None set

JOINT STIPULATION AND ORDER SETTING CASE SCHEDULE

1 **WHEREAS** on April 28, 2020 the Court entered a Pretrial Scheduling Order setting the
2 discovery and dispositive motion deadlines for the above-captioned case;

3 **WHEREAS**, document production in this matter involves locating, reviewing and producing
4 over 13 years of records from the parties as well as substantial third-party discovery;

5 **WHEREAS**, the parties have worked diligently to move discovery forward, and have made
6 substantial progress, but need more time to complete discovery due to the ongoing impact of the
7 COVID-19 pandemic;

8 **WHEREAS**, the parties have also discussed ways to streamline the cost and expense of the
9 expert reports in this litigation and believe bifurcating damages quantification analysis will assist
10 them in preparing dispositive motions in a cost effective manner and in pursuing potential resolution
11 of these claims;

12 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties and their
13 undersigned counsel, subject to the approval of the Court, that the pretrial scheduling order will be
14 modified as follows:
15

Event	Deadline
Close of Fact Discovery	November 17, 2021
Opening expert reports for parties with the burden of proof (excluding reports related to the quantification of damages)	December 17, 2021
Responsive expert reports (excluding reports related to the quantification of damages)	February 1, 2022
Close of expert discovery	March 1, 2022
Dispositive Motion Hearing Deadline	May 5, 2022
Expert disclosures and discovery related to the quantification of damages	Following the Court’s Ruling on Motions for Summary Judgment

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Dated: April 2, 2021

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Anne M. Kelts

WILLIAMS & CONNOLLY LLP
John E. Joiner
William P. Ashworth

By: /s/ William P. Ashworth
William P. Ashworth

*Attorneys for Defendants
Sprint Solutions, Inc. and
Nextel of California, Inc.*

Dated: April 2, 2021

COTCHETT, PITRE & McCARTHY LLP
Niall P. McCarthy
Eric J. Buescher

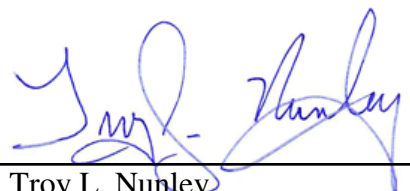
By: /s/ Eric J. Buescher
Eric J. Buescher

Attorneys for Plaintiff City of Los Angeles

ORDER

IT IS SO ORDERED.

Dated: April 2, 2021



Troy L. Nunley
United States District Judge