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 4 Guardian ad Litem of ANDREW SAXTON,
 a minor, JARED SAXTON, a minor, GAVIN SAXTON,
 5 a minor and SARAH TORRES as Guardian Ad Litem of
 TAYLOR SAXTON, a minor

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 9 NICOLE SAXTON, individually and as
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 10 a minor, JARED SAXTON, a minor, GAVIN SAXTON,
 a minor and SARAH TORRES as Guardian Ad Litem of
 11 TAYLOR SAXTON, a minor

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 17 Corporation, Covenant Transport, Inc., a Tennessee
 Corporation, Chih Ming Sun

18
19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21
22 NICOLE SAXTON, individually and as
 Guardian ad Litem of ANDREW SAXTON, a
 23 minor, JARED SAXTON, a minor, GAVIN
 SAXTON, a minor and SARAH TORRES as
 24 Guardian ad Litem of TAYLOR SAXTON, a
 25 minor,

26 Plaintiffs,

27 v.

CASE NO. 3:09 cv-05068 JCS

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO
COMPLETE FACT AND EXPERT
DISCOVERY**

1 COVENANT TRANSPORTATION GROUP,
2 INC., a Nevada Corporation, COVENANT
3 TRANSPORT, INC., a Tennessee
4 Corporation, CHIH MING SUN, an
5 individual and Does 1-100,
6
7 Defendants.

8 **WHEREAS**, this Court entered its Further Case Management and Pre-Trial Order on July
9 22, 2010 (Doc. No. 41) (the "July 22nd Order"), by which various discovery and other pre-trial
10 deadlines were set;

11 **WHEREAS**, parties agree that the fact discovery and expert discovery deadlines set forth
12 in the July 22, 2010 Order be extended approximately sixty (60) days to accommodate scheduling
13 conflicts created by other litigation matters in which counsel are involved, to allow time for
14 additional depositions and or discovery as may be needed to effectively prepare for the November
15 3, 2010 settlement conference before Magistrate Judge Larson and the February 7, 2011 trial of the
16 matter.

17 **WHEREAS**, parties jointly agree to the requested extension; THEREFORE, IT IS
18 HEREBY STIPULATED AND AGREED, by and between plaintiffs NICOLE SAXTON,
19 individually and as Guardian ad Litem of ANDREW SAXTON, a minor, JARED SAXTON, a
20 minor, GAVIN SAXTON, a minor and SARAH TORRES as Guardian ad Litem of TAYLOR
21 SAXTON, a minor; and defendants COVENANT TRANSPORTATION GROUP, INC., a Nevada
22 Corporation, COVENANT TRANSPORT, INC., a Tennessee Corporation, CHIH MING SUN, by
23 and through their respective counsel of record, that, subject to the Court's approval, the discovery
24 deadlines set forth in Paragraphs 3 and 4 of the July 22 Order shall be amended as follows:

- 25 1. The deadline to complete all non-expert discovery is continued from October 1,
26 2010 to November 1, 2010;
- 27 2. Expert disclosure and production of expert reports by the parties is continued from
28 August 1, 2010 to October 15, 2010;
3. The deadline to complete all expert discovery is continued from October 15, to
November 15, 2010.

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4. Except as expressly set forth herein, no other provisions of the July 22 Order are modified.

Given that the settlement conference is not until November 3, 2010 and trial of the matter is set for February 7, 2011, there will be no prejudice to either plaintiffs or defendants by continuing those discovery deadlines

DATED: September 1, 2010

/s/ ROBERT MASSI

ROBERT A. MASSI
DANIEL A. HOROWITZ
Attorneys for Plaintiffs
NICOLE SAXTON, et AND AS GUARDIAN AD LITEM OF ANDREW SAXTON, A MINOR, JARED SAXTON, A MINOR, GAVIN SAXTON, A MINOR AND SARAH TORRES AS GUARDIAN AD LITEM OF TAYLOR SAXTON, A MINOR

DATED: September 1, 2010

CESARI, WERNER AD MORIARTY

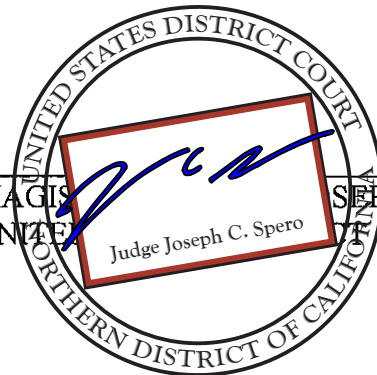


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Attorneys for Defendants
Covenant Transportation Group, Inc., a Nevada Corporation, Covenant Transport, Inc., a Tennessee Corporation, Chih Ming Sun

ORDER

IT IS SO ORDERED on this 2nd of September, 2010.

MAGIS
UNITE
SEPH C. SPERO
COURT



Judge Joseph C. Spero