

Hunton & Williams LLP  
550 South Hope Street, Suite 2000  
Los Angeles, California 90071-2627

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HUNTON & WILLIAMS LLP  
Belynda Reck (SBN 163561)  
Diana Biason (SBN 247274)  
550 South Hope Street, Suite 2000  
Los Angeles, California 90071-2627  
Telephone: (213) 532-2000  
Facsimile: (213) 532-2020  
E-mail: breck@hunton.com  
dbiason@hunton.com

HUNTON & WILLIAMS LLP  
Jeffrey N. Martin (Admitted Pro Hac Vice)  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
Telephone: (202) 955-1552  
Facsimile: (202) 862-3607  
E-mail: jmartin@hunton.com

Attorneys for Plaintiff and Counter-Defendant  
GEORGIA-PACIFIC LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GEORGIA-PACIFIC LLC,  
  
Plaintiff,  
  
v.  
  
OFFICEMAX INCORPORATED,  
LOUISIANA-PACIFIC  
CORPORATION, AND THE CITY OF  
FORT BRAGG,  
  
Defendants.

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AND RELATED COUNTERCLAIMS  
AND CROSSCLAIMS

CASE NO.: 12-02797-WHO

**STIPULATION AND ORDER FOR  
MODIFICATION OF DISCOVERY  
DEADLINES AND TRIAL  
SCHEDULE**

Judge: Hon. William H. Orrick

Complaint Filed: May 31, 2012  
Amd. Complaint Filed: June 4, 2012  
2<sup>nd</sup> Amd. Complaint Filed: May 21, 2013

JURY TRIAL DEMANDED

1 Plaintiff and Counter-Defendant Georgia-Pacific LLC (“Georgia-Pacific”),  
2 Defendant and Counter-Plaintiff OfficeMax Incorporated (“OfficeMax”), Defendant  
3 and Counter-Plaintiff Louisiana-Pacific Corporation (“Louisiana-Pacific”), and  
4 Defendant and Counter-Plaintiff City of Fort Bragg (collectively “the parties”) hereby  
5 agree and, pursuant to the September 11, 2013 case management conference in which  
6 the case schedule was discussed and the parties received the Court’s guidance on the  
7 trial schedule, respectfully request that the Court modify the case schedule as follows:

8 1. FACT DISCOVERY. On or before July 10, 2014 (an extension from  
9 December 31, 2013) all non-expert discovery shall be completed by the parties.

10 2. EXPERT WITNESSES. The disclosure and discovery of expert  
11 witnesses and opinions shall proceed as follows:

12 A. On or before May 16, 2014 (an extension from January 31, 2014)  
13 Georgia-Pacific will make initial expert disclosures in accordance with Federal Rule  
14 of Civil Procedure 26(a)(2).

15 B. On or before July 2, 2014 (an extension from January 31, 2014) all  
16 parties other than Georgia-Pacific will make initial expert disclosures in accordance  
17 with Federal Rule of Civil Procedure 26(a)(2).

18 C. On or before August 1, 2014, (an extension from February 20, 2014) all  
19 parties will make rebuttal expert disclosures in accordance with the Federal Rule of  
20 Civil Procedure 26(a)(2).

21 D. On or before September 2, 2014 (an extension from April 15, 2014), all  
22 discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4)  
23 shall be completed.

24 3. PRETRIAL MOTIONS. All pretrial dispositive motions shall be heard  
25 no later than October 1, 2014 (an extension from July 17, 2014).

26 4. PRETRIAL CONFERENCE. The pretrial conference will be held on  
27 December 15, 2014 at 2:00 p.m.

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5. TRIAL. Jury trial will be set for January 5, 2015 at 8:30 a.m.

6. FURTHER CASE MANAGEMENT CONFERENCE. A case management conference will be set for March 18, 2014 at 2:00 p.m. The case management conference set for January 9, 2014 is vacated.

7. The parties agree that no party deposition notices will be served or production of electronic discovery will occur until the earlier of December 3, 2013 or the day after the next mediation session with Judge Phillips is completed, which mediation is scheduled for November 8, 2013 and/or December 2, 2013, and that other party discovery will be limited to third-party discovery related to potential insurance issues, responses to the existing discovery requests of the City of Fort Bragg, follow-up on or additional document subpoenas to third-parties, and informal site visits by expert witnesses.

8. The parties further agree they will meet and confer in good faith with the goal of obtaining a stipulation regarding the production of Electronically Stored Information (“ESI”) such that an agreement on the protocol for production of ESI would be in place to allow preparation for production to begin on December 3, 2013.

No party will use the signing of this stipulation against any other party in connection with seeking or opposing further extensions.

DATED: September 12, 2013 HUNTON & WILLIAMS LLP

By: /s/ Belynda Reck  
Belynda Reck  
Attorney for Plaintiff and Counter-Defendant  
GEORGIA-PACIFIC LLC

