

1 Brent M. Karren (State Bar No. 291038)  
 2 bkarren@mgmlaw.com  
 3 Dustin C. Beckley (State Bar No. 238692)  
 4 dbeckley@mgmlaw.com  
 5 **MANION GAYNOR & MANNING LLP**  
 444 South Flower Street, Suite 1550  
 Los Angeles , CA 90071  
 Tel: (213) 622-7300  
 Fax: (213) 622-7313

6 Attorneys for Defendant  
 7 **THE BOEING COMPANY, individually and as**  
 8 **successor by merger to McDONNELL DOUGLAS**  
 9 **CORPORATION, successor by merger with**  
 10 **DOUGLAS AIRCRAFT COMPANY**

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

LAW OFFICES OF  
 MANION GAYNOR & MANNING LLP

13 JOSEPH THRASH and CHEZ THRASH,  
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 15 Plaintiffs,  
 16  
 17 vs.  
 18 CIRRUS ENTERPRISES, LLC, et al.,  
 19  
 20 Defendants.

Case No. 3:17-cv-01501-JST

**STIPULATION AND ~~PROPOSED~~**  
**ORDER RE: DEPOSITIONS OF EXPERT**  
**WITNESSES**

1 Plaintiffs and defendants hereby stipulate as follows and request that the Court approve the  
2 parties' stipulation regarding the depositions of expert witnesses:

- 3 1) Plaintiffs and defendants have stipulated that it is not necessary to subpoena the  
4 opposing side's expert witnesses in this case. Any party who wants to take any opposing  
5 party's expert deposition in person can do so near the expert's location at the noticing  
6 party's expense.
- 7 2) Rather than having to serve a subpoena, a party may request dates of availability of an  
8 opposing party's experts, and, within 48 hours of such request, the opposing party will  
9 provide dates of their experts' availability for deposition. The requesting party may  
10 subsequently serve a notice of deposition including requests for production of  
11 documents at the deposition (subject to proper objections).

12 The filing party attests that all other signatories listed, and on whose behalf the filing is  
13 submitted, concur in the filing's content and have authorized the filing.

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15  
16 Dated: February 14, 2018

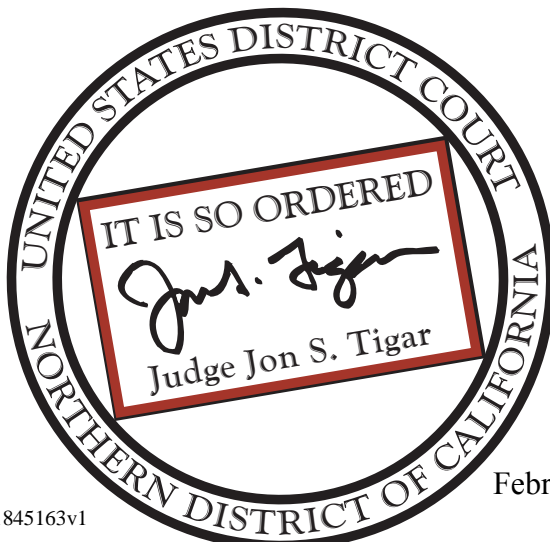
**WEITZ & LUXENBERG, P.C.**

17 By:           //s// Robert Green            
18 Robert Green, Esq.  
19 Attorney for Plaintiffs

20 Dated: February 14, 2018

**MANION GAYNOR & MANNING LLP**

21 By:           //s// Dustin C. Beckley            
22 Dustin C. Beckley, Esq.  
23 Brent M. Karren , Esq.  
24 Attorneys for Defendant  
25 **THE BOEING COMPANY**



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28 February 15, 2018

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Dated: February 14, 2018

**GLAZIER YEE LLP**

By:           //s// Deborah M. Parker            
Deborah M. Parker, Esq.  
Attorneys for Defendant  
**LOCKHEED MARTIN CORPORATION**

Dated: February 14, 2018

**TUCKER ELLIS LLP**

By:           //s// Lance Wilson            
Lance Wilson, Esq.  
Attorneys for Defendant  
**UNITED TECHNOLOGIES CORPORATION**

Dated: February 14, 2018

**GORDON & REES LLP**

By:           //s// Michael J. Pietrykowski            
Michael J. Pietrykowski, Esq.  
Attorneys for Defendant  
**THE GOODYEAR TIRE & RUBBER  
COMPANY**

Dated: February 14, 2018

**MANION GAYNOR & MANNING LLP**

By:           //s// David Michael Glaspy            
David Michael Glaspy, Esq.  
Attorneys for Defendant  
**ROHR, INC.**

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Dated: February 14, 2018

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

By:           //s// Florence Anne McClain-Meza            
Florence Anne McClain-Meza, Esq.

Attorneys for Defendant

**HENKEL CORPORATION, individually and as  
s-i-i to DEXTER CORP., DEXTER HYSOL  
AEROSPACE LLC**

Dated: February 14, 2018

**LEADER & BERKON LLP**

By:           //s// Bobbie Rae Bailey            
Bobbie Rae Bailey, Esq.

Attorneys for Defendant

**IMO Industries Inc.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

\_\_\_\_\_  
United States District Judge