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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA *ex rel.*
 17 RICHARD WILSON and CHRIS MARANTO,

18 Plaintiff,

19 v.

20 MAXXAM INC., a Delaware corporation; THE
 PACIFIC LUMBER COMPANY, a Delaware
 21 corporation; SCOTIA PACIFIC COMPANY
 LLC, a Delaware limited liability company;
 22 SALMON CREEK LLC, a Delaware limited
 liability company; CHARLES E. HURWITZ, an
 23 individual,

24 Defendants.

Case No. C-06-7497 CW (JCS)

**STIPULATION AND ORDER
 EXTENDING EXPERT
 DISCOVERY DEADLINES**

Judge: Honorable Claudia Wilken
 Place: Courtroom 2, 4th Floor

Complaint Filed: December 7, 2006
 Trial Date: April 20, 2009

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 IT IS HEREBY STIPULATED by and between the parties and their respective counsel of
3 record, Sean E. Ponist, attorney for relators Richard Wilson and Chris Maranto on behalf of
4 Plaintiff United States of America (collectively, "Plaintiff"), and Brian J. Martinez, attorney for
5 Defendants MAXXAM Inc., Charles Hurwitz ("Defendants") and third party Humboldt Redwood
6 Company ("HRC"), that:

7 WHEREAS, the cut-off date for expert discovery is currently January 23, 2009;

8 WHEREAS, experts for both parties have conflicts and are not available to be deposed
9 before January 23, 2009;

10 WHEREAS, Defendants and HRC have recently produced a large volume of hard copy
11 and electronic discovery, which Plaintiff's experts need to review;

12 WHEREAS, Plaintiff's experts will be supplementing their expert reports under the
13 Federal Rules of Civil Procedure based on a review of Defendants' and HRC's recent document
14 productions; and

15 WHEREAS, the parties wish to extend the expert discovery deadlines in light of the
16 forgoing circumstances, without prejudice to their rights to seek further relief from the Court.

17 NOW, THEREFORE, counsel for the parties hereby stipulate and request that the Court
18 enter an order as follows:

19 1. The expert discovery cut-off shall be extended to March 6, 2009.

20 The parties respectfully request that the Court approve this Stipulation.

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Dated: January 14, 2009

COTCHETT, PITRE & McCARTHY

By: /s/ Sean E. Ponist
Sean E. Ponist

Attorneys for Plaintiff THE UNITED STATES OF
AMERICA ex rel. RICHARD WILSON and
CHRIS MARANTO

Dated: January 14, 2009

MORRISON & FOERSTER LLP

By: /s/ Brian J. Martinez
Brian J. Martinez

Attorneys for Defendants MAXXAM INC. and
CHARLES E. HURWITZ

I, Sean E. Ponist, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order. Pursuant to General Order 45, I hereby attest that Brian J. Martinez has concurred in this filing.

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ORDER

Pursuant to the stipulation of the parties, IT IS SO ORDERED.

1/22/09

Dated: _____



HONORABLE CLAUDIA WILKEN
United States District Judge
Northern District of California