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Attorneys for Plaintiff  
 CHIQUITA FRESH NORTH AMERICA, L.L.C.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

CHIQUITA FRESH NORTH AMERICA,  
 L.L.C.,

Plaintiff,

v.

GREENE TRANSPORT COMPANY; JOHN  
 GREENE LOGISTICS COMPANY; and  
 DOES 1 through 20, inclusive,

Defendants.

No. C-11-06683-DMR

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND REBUTTAL  
 EXPERT DISCLOSURE AND EXPERT  
 DISCOVERY DEADLINES**

**RECITALS**

1. On April 4, 2013 (in Docket Item No. 55), this Court set the following schedule for expert discovery: expert disclosure and reports due June 15, 2013; rebuttal expert disclosure and reports due June 30, 2013 and completion of expert discovery on July 14, 2013;

2. At the time the above expert deadlines were set, the trial of this matter was scheduled for September 9, 2013;

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1 3. At the June 20, 2013 case management conference, the Court continued the trial of this  
2 matter to April 28, 2014;

3 4. On June 14, 2013, Defendant John Greene Logistics Company served its expert  
4 disclosure on the alter ego issue and this disclosure did not contain the expert report;

5 5. On June 21, 2013, Defendant John Greene Logistics Company served its expert report;

6 6. Given the continuance of the trial and the delay in service of Defendant John Greene  
7 Logistics Company's expert report, the parties believe there is good cause for Plaintiff Chiquita  
8 Fresh North America, LLC to have until July 15, 2013 to serve its rebuttal expert report and  
9 disclosure and that expert discovery be completed by September 12, 2013;

10 Accordingly, the parties HEREBY STIPULATE as follows:

11 **STIPULATION**

12 1. The deadline for service of rebuttal expert disclosure and reports is continued from June  
13 30, 2013 to July 15, 2013;

14 2. The deadline for completing expert discovery is continued from July 14, 2013 to  
15 September 12, 2013.

16 DATED: June 24, 2013

BURNHAM BROWN

17  
18 By: /s/ Robert M. Bodzin  
19 ROBERT M. BODZIN  
20 RAYMOND A. GREENE, III  
21 ALISON F. GREENE  
22 Attorneys for Plaintiff  
23 CHIQUITA FRESH  
24 NORTH AMERICA, L.L.C.

25 DATED: June 24, 2013

LOW BALL & LYNCH

26 By: /s/  
27 MARK F. HAZELWOOD  
28 DIRK D. LARSEN  
Attorneys for Defendant  
GREENE TRANSPORT COMPANY

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DATED: June 24, 2013

PHILLIPS, SPALLAS & ANGSTADT

By: /s/

TODD ANGSTADT

ELISA RHEIN MARCALETTI

Attorneys for Defendant

JOHN GREENE LOGISTICS COMPANY

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**~~PROPOSED~~ ORDER**

1. The deadline for service of rebuttal expert disclosure and reports is continued from June 30, 2013 to July 15, 2013;

2. The deadline for completing expert discovery is continued from July 14, 2013 to September 12, 2013.

IT IS SO ORDERED.

DATED: June 26, 2013



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DONNA M. RYU  
United States Magistrate Judge

4814-8687-1572, v. 1