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7 Attorneys for Debtor  
 City of Stockton

9 UNITED STATES BANKRUPTCY COURT  
 10 EASTERN DISTRICT OF CALIFORNIA  
 11 SACRAMENTO DIVISION

13 In re:  
 14 CITY OF STOCKTON, CALIFORNIA,  
 15 Debtor.

Case No. 2012-32118  
 D.C. No. OHS-1  
 Chapter 9

**STIPULATION AND ~~PROPOSED~~  
 ORDER MODIFYING ELIGIBILITY  
 SCHEDULING ORDER**

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RECEIVED  
 October 09, 2012  
 CLERK, U.S. BANKRUPTCY COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 0004477021

1 Debtor the City of Stockton, California (the “City”), and the undersigned parties (the  
2 “Objectors”), through their respective counsel, hereby stipulate to the following extensions of  
3 time in this matter:

4 1. The City shall continue to produce documents responsive to the Objectors’  
5 pending informal and formal discovery requests on a rolling basis so as to conclude such  
6 production by no later than October 15, 2012.

7 2. The Objectors may continue to conduct discovery relating to the City’s eligibility  
8 for chapter 9 relief through and including November 16, 2012 (assuming that the City continues  
9 producing documents as promptly as practicable on a rolling basis and confirms in writing to the  
10 Objectors the completion thereof on or before October 15, 2012). Notwithstanding this discovery  
11 cut-off, (a) with the City’s consent, the Objectors may conduct depositions of City representatives  
12 after November 16, 2012; and (b) the Objectors may conduct a third-party deposition of CalPERS  
13 after November 16, 2012 if the CalPERS deposition cannot be concluded prior to November 16,  
14 2012.

15 3. The Objectors’ supplementary substantive objections to the City’s eligibility for  
16 chapter 9 relief, including briefing, declarations and expert reports, if any, shall be filed on or  
17 before December 5, 2012.

18 4. The City may conduct discovery relating to any substantive objections to the  
19 City’s eligibility for chapter 9 relief through and including January 16, 2013; provided, however,  
20 that the City shall not conduct any depositions prior to November 12, 2012.

21 5. The City’s reply to any substantive objections to its eligibility for chapter 9 relief,  
22 including responsive briefing, declarations and expert reports, if any, shall be filed on or before  
23 January 30, 2013.

24 6. The Objectors may conduct discovery relating to the responsive briefing,  
25 declarations and expert reports, if any, filed by the City pursuant to Paragraph 5 hereof, through  
26 and including February 13, 2013.

27 7. The Court will hold a status conference on February 19, 2013, at 1:30 p.m.

28 8. The Stipulation and Protective Order entered by this Court on September 28, 2012,

1 Dkt. No. 564, should be modified such that (i) any references to "November 9, 2012" are hereby  
2 deleted and replaced by "December 5, 2012"; and (ii) any references to "December 21, 2012," are  
3 hereby deleted and replaced by "January 30, 2013."

4 Dated: October 8, 2012

ORRICK, HERRINGTON & SUTCLIFFE LLP

5  
6 By *Norman C. Hile*  
7 Norman C. Hile  
8 Attorneys for City of Stockton, Debtor

9 Dated: October 8, 2012

SIDLEY AUSTIN LLP

10 By \_\_\_\_\_  
11 Guy S. Neal  
12 Attorneys for Assured Guaranty Corp. and  
13 Assured Guaranty Municipal Corp.

14 Dated: October 8, 2012

WINSTON & STRAWN LLP

15 By signature attached  
16 Lawrence A. Larose  
17 Attorneys for National Public Finance  
18 Guarantee Corporation

19 Dated: October 8, 2012

JONES DAY

20 By signature attached  
21 James O. Johnston  
22 Attorneys for Franklin Advisors, Inc.

23 Dated: October 8, 2012

MINTZ LEVIN COHN FERRIS GLOVSKY AND  
24 POPEO P.C.

25 By signature attached  
26 Michael Gardener  
27 Attorneys for Wells Fargo Bank,  
28 National Association

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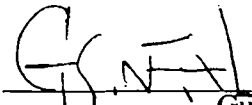
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16 Attorneys for National Public Finance  
Guarantee Corporation

17 Dated: October 8, 2012

JONES DAY

18 By \_\_\_\_\_  
19 Joshua D. Morse  
20 Attorneys for Franklin High Yield Tax-Free  
21 Income Fund and Franklin California High  
Yield Municipal Fund

22 Dated: October 8, 2012

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Michael Gardener  
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**ORDER**

IT IS HEREBY ORDERED that:

1. The City shall continue to produce documents responsive to the Objectors' pending informal and formal discovery requests on a rolling basis so as to conclude such production by no later than October 15, 2012.

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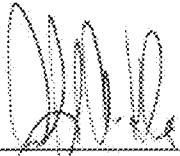
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8. The Stipulation and Protective Order entered by this Court on September 28, 2012, Dkt. No. 564, is modified such that (i) any references to "November 9, 2012" are hereby deleted



1 and replaced by "December 5, 2012"; and (ii) any references to "December 21, 2012," are hereby  
2 deleted and replaced by "January 30, 2013."

3  
4 Dated: October 18, 2012

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6   
7 \_\_\_\_\_  
8 United States Bankruptcy Judge  
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