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1 MARC A. LEVINSON (STATE BAR NO. 57613)
 malevinson@orrick.com
 2 NORMAN C. HILE (STATE BAR NO. 57299)
 nhile@orrick.com
 3 PATRICK BOCASH (STATE BAR NO. 262763)
 pbocash@orrick.com
 4 ORRICK, HERRINGTON & SUTCLIFFE LLP
 400 Capitol Mall, Suite 3000
 5 Sacramento, California 95814-4497
 Telephone: (916) 447-9200
 6 Facsimile: (916) 329-4900

7 Attorneys for Debtor
 City of Stockton
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9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION
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13 In re:
 14 CITY OF STOCKTON, CALIFORNIA,
 15 Debtor.

Case No. 2012-32118
 Chapter 9
 Adv. No. 13-02315

16 WELLS FARGO BANK, NATIONAL
 17 ASSOCIATION, FRANKLIN HIGH
 18 YIELD TAX-FREE INCOME FUND,
 19 AND FRANKLIN CALIFORNIA
 HIGH YIELD MUNICIPAL FUND,

20 Plaintiffs,

21 v.

22 CITY OF STOCKTON, CALIFORNIA,
 23 Defendant.

**STIPULATION FOR ORDER
 MODIFYING ORDER GOVERNING
 THE DISCLOSURE AND USE OF
 DISCOVERY INFORMATION AND
 SCHEDULING DATES RELATED TO
 THE TRIAL IN THE ADVERSARY
 PROCEEDING AND ANY
 EVIDENTIARY HEARING
 REGARDING CONFIRMATION OF
 PROPOSED PLAN OF ADJUSTMENT**

1 Debtor the City of Stockton, California (the “City”), and the undersigned parties
2 (collectively, the “Parties”), through their respective counsel, hereby stipulate to modify the
3 Court’s December 10, 2013 Order Governing The Disclosure And Use Of Discovery Information
4 And Scheduling Dates Related To The Trial In The Adversary Proceeding And Any Evidentiary
5 Hearing Regarding Confirmation Of Proposed Plan Of Adjustment (the “Scheduling Order”):¹

6 1. The City shall complete production of documents responsive to the Request Of
7 Franklin High Yield Tax-Free Income Fund And Franklin California High Yield Municipal Fund
8 For Production Of Confirmation-Related Documents, Sets One and Two, and the Request Of
9 Franklin High Yield Tax-Free Income Fund And Franklin California High Yield Municipal Fund
10 For Production Of Adversary Action-Related Documents, Sets One and Two (collectively, the
11 “Franklin RFPs”) on or before February 21, 2014. While the City must complete its discovery by
12 February 21, 2014, the City shall continue to produce responsive documents to the Parties on a
13 rolling basis. The deadline for all other Parties to complete production of documents responsive
14 to the requests served upon them shall be February 5, 2014.

15 2. On or before January 31, 2014, each Party shall exchange and provide to the other
16 Parties preliminary lists of all witnesses (other than witnesses from whom expert reports will be
17 submitted pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure) that such Party
18 then believes that it may call to provide testimony at the Trial or the Hearing, as described in ¶ 28
19 of the Scheduling Order. Also on or before January 31, 2014, each Party intending to present
20 expert testimony shall exchange and provide to the other Parties the identity of any expert witness
21 it may use to present evidence in its case-in-chief and shall provide a written summary of the
22 topics that each such witness is expected to address, as described in ¶ 30 of the Scheduling Order.

23 3. The City shall file its summary memorandum in support of the Plan on or before
24 February 3, 2014. The deadline by which any Party that sought discovery from the City may
25 serve and file a timely objection to the confirmation of the Plan is February 26, 2014. The
26 deadline for any Party that did not seek discovery from the City, or any third party, to timely file

27 ¹ Unless otherwise specified herein, capitalized terms shall have the same meaning as used in the Scheduling Order.
28 This stipulation is intended to change only the dates of the affected deadlines, and does not otherwise alter the
Scheduling Order.

1 an objection to the confirmation of the Plan remains February 10, 2014. As described in ¶ 52 of
2 the Scheduling Order, such memoranda and objections may be filed in summary form in such a
3 manner as to fully identify the issues to be addressed at the Hearing.

4 4. The depositions of any fact witness shall be taken no later than March 14, 2014.

5 5. On or before March 21, 2014, each Party intending to present expert testimony
6 shall serve and file its expert reports as provided in ¶ 31 of the Scheduling Order. Also on or
7 before March 21, 2014, each Party intending to present evidence shall serve on each other Party a
8 list of fact and expert witnesses (other than rebuttal and impeachment witnesses) whose testimony
9 the Party may submit at the Trial or Hearing, as described in ¶ 36 of the Scheduling Order.

10 6. Each Party shall serve on each of the other Parties a list of exhibits (other than
11 those to be used for impeachment or rebuttal) that the Party intends to introduce into evidence at
12 the Trial and/or the Hearing no later than April 4, 2014, as described in ¶ 37 of the Scheduling
13 Order.

14 7. The City may file a supplemental memorandum in support of the Plan no later than
15 March 31, 2014. Any Party or third party that filed a timely objection to the confirmation of the
16 Plan may file a supplemental objection to confirmation of the Plan no later than April 21, 2014.
17 Supplemental responsive pleadings to any objection to confirmation of the Plan may be filed no
18 later than April 28, 2014.

19 8. On or before April 4, 2014, each Party intending to present rebuttal expert
20 testimony shall serve and file its rebuttal expert reports, as described in ¶ 32 of the Scheduling
21 Order.

22 9. Expert depositions shall commence on or after April 8, 2014, and must conclude
23 by no later than April 18, 2014.

24 10. The City and Franklin shall file in the Proceeding a joint statement of uncontested
25 facts relating to the Trial on April 7, 2014.

26 11. The City and Franklin shall serve and file pretrial opening briefs in the Proceeding
27 on April 7, 2014.

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1 12. The City and Franklin shall serve and file pretrial reply briefs in the Proceeding on
2 April 21, 2014.

3 13. Each Party shall file and serve any Direct Testimony Declarations by April 21,
4 2014.

5 14. By no later than April 21, 2014, each Party shall serve on the other Parties the
6 Party's designation, by page and line number(s), of any deposition testimony from fact witnesses
7 they reasonably anticipate offering into evidence, as described in ¶ 40 of the Scheduling Order.

8 15. By no later than April 25, 2014, each Party shall serve (a) any counterdesignations
9 of deposition testimony; and (b) any written objections to the admission of all or any part of the
10 exhibits identified on the list of exhibits provided by each Party, as described in ¶ 44 of the
11 Scheduling Order. By no later than May 6, 2014, each Party shall serve any response to such
12 counterdesignations and written objections.

13 16. By no later than April 25, 2014, the Parties shall exchange copies of any exhibits
14 identified in the exchanged exhibit lists that have not been previously produced or delivered.

15 17. By no later than April 25, 2014, the Parties shall file and serve any *Daubert*
16 motions and any other motions in limine. By no later than May 6, 2014, the Parties shall file and
17 serve any oppositions to any *Daubert* motions or other motions in limine.

18 18. Any Party wishing to cross-examine any other Party's witnesses at the Trial or the
19 Hearing shall so notify the other Party by electronic mail no later than May 8, 2014, as described
20 in ¶ 49 of the Scheduling Order.

21 19. On May 12, 2014, at 9:30 a.m., the Court shall hear argument on any *Daubert*
22 motions, any motions in limine, and any objections to Direct Testimony Declarations, deposition
23 designations, and other exhibits filed and served pursuant to this Order. Prior to the start of the
24 Trial and the Hearing, the Court shall rule on all objections, motions, and other matters raised by
25 the Parties prior to the May 12, 2014, hearing.

26 20. The Trial and the Hearing shall commence on May 12, 2014, following the
27 conclusion of the hearing on the objections, motions, and other matters raised by the Parties, as
28 described in ¶ 51 of the Scheduling Order.

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Dated: January 28, 2014

ORRICK, HERRINGTON & SUTCLIFFE LLP

By /s/ Norman C. Hile
Norman C. Hile
Attorneys for City of Stockton, Debtor

Dated: January 28, 2014

JONES DAY

By /s/ James O. Johnston
James O. Johnston
Attorneys for Franklin

Dated: January 28, 2014

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO P.C.

By /s/ Adrienne Walker
Adrienne Walker
Attorneys for Wells Fargo Bank,
National Association, as Indenture Trustee

Dated: January 28, 2014

SIDLEY AUSTIN LLP

By /s/ Christina M. Craige
Christina M. Craige
Attorneys for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.

Dated: January 28, 2014

WEIL, GOTSHAL & MANGES LLP

By /s/ Debra Dandeneau
Debra Dandeneau
Attorneys for National Public Finance
Guarantee Corporation

Dated: January 28, 2014

ARENT FOX LLP

By /s/ David Dubrow
David Dubrow
Attorneys for Ambac Assurance Corp.

1 Dated: January 28, 2014

K&L GATES LLP

2

3

By /s/ Michael J. Gearin

4

Michael J. Gearin
Attorneys for California Public Employees'
Retirement System

5

Dated: January 28, 2014

FELDERSTEIN, FITZGERALD, WILLOUGHBY &
PASCUZZI LLP

6

7

8

By /s/ Jason E. Rios

9

Jason E. Rios
Attorneys for the Official Committee of Retirees

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