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12 Attorneys for Defendants,
13 GUARDIAN PROTECTION PRODUCTS, INC. and
14 RPM WOOD FINISHES GROUP, INC.

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

17 G.P.P., Inc., d/b/a GUARDIAN INNOVATIVE) CASE NO. 1:15-cv-00321 SKO
18 SOLUTIONS)
19 Plaintiff,)
20 vs.)
21 GUARDIAN PROTECTION PRODUCTS, INC. and)
22 RPM WOOD FINISHES GROUP, INC.)
23 Defendants.)
24)
25)
26)
27)
28)
AND RELATED COUNTERCLAIM)
)
)

**STIPULATION AND ORDER
REGARDING EXPERT
DISCOVERY**
(Doc. 403)

20 Pursuant to L.R.143, Defendant Guardian Protection Products, Inc. (“Guardian”) and
21 Plaintiff G.P.P., Inc., d/b/a Guardian Innovative Solutions (“GIS”) hereby stipulated as follows:
22 WHEREAS, on May 26, 2020, this Court issued an Order Granting Plaintiff’s Motion for
23 Leave to Supplement the Complaint (the “Order”).
24 WHEREAS, the Order, among other things, reopened discovery for the limited purpose
25 of addressing the issues of damages that have occurred since the trial in this case and as a result
26 of the additional alleged breaches, and permitted each side one Rule 30(b)(6) deposition of no
27 more than seven (7) hours, and any limited necessary written discovery related to the
28 depositions.

1 WHEREAS, the Order did not expressly provide for expert discovery or further expert
2 depositions.

3 WHEREAS, Guardian and GIS believe that there is good cause for the Court to permit
4 additional expert discovery, including further expert depositions in this matter.

5 WHEREAS, on January 5, 2021, GIS served a Supplemental Expert Witness Disclosure.

6 WHEREFORE, Guardian and GIS hereby stipulate that:

7 1. Guardian shall provide its expert report to GIS by no later than February 5, 2021.

8 2. Guardian and GIS shall produce any documents relied upon in their expert reports
9 by no later than February 5, 2021, to the extent such documents have not already been produced
10 to the other side during discovery and/or during the prior trial in this matter.

11 3. Guardian and GIS shall submit any rebuttal reports by no later than March 5,
12 2021, along with any documents relied upon in the rebuttal reports, to the extent such documents
13 have not already been produced.

14 4. Guardian and GIS shall be entitled to one deposition of each expert disclosed by
15 the other side, not to exceed seven (7) hours, to be completed by no later than April 2, 2021.

16 **IT IS SO STIPULATED.**

17 Dated: January 19, 2021

GORDON & REES LLP

18
19 By: /s/ Calvin E. Davis

Calvin E. Davis

Attorneys for Defendants

20
21 Dated: January 19, 2021

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

22
23 By: /s/ Dylan J. Liddiard (as authorized on 1/19/21)

Dylan J. Liddiard

Attorneys for Plaintiff

24
25 **ORDER**

26 Based on the parties' above-stipulation (Doc. 403), and for good cause shown, it is
27 ORDERED that:

28 1. Guardian shall provide its expert report to GIS by no later than February 5, 2021;

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2. Guardian and GIS shall produce any documents relied upon in their expert reports by no later than February 5, 2021, to the extent such documents have not already been produced to the other side during discovery and/or during the prior trial in this matter;
3. Guardian and GIS shall submit any rebuttal reports by no later than March 5, 2021, along with any documents relied upon in the rebuttal reports, to the extent such documents have not already been produced; and
4. Guardian and GIS shall be entitled to one deposition of each expert disclosed by the other side, not to exceed seven (7) hours, to be completed by no later than April 2, 2021.

IT IS SO ORDERED.

Dated: January 20, 2021

/s/ Sheila K. Olerto
UNITED STATES MAGISTRATE JUDGE