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Attorneys for Defendant  
 Guardian Protection Products, Inc.

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 FRESNO DIVISION

G.P.P., Inc., d/b/a GUARDIAN INNOVATIVE  
 SOLUTIONS,

Plaintiff,

vs.

GUARDIAN PROTECTION PRODUCTS, INC.

Defendant.

CASE NO. 1:15-cv-00321 SKO

**JOINT STIPULATION RE:  
 EXTENDING FACT WITNESS  
 DISCOVERY DEADLINE FOR  
 THE TAKING OF AGREED UPON  
 FACT WITNESS DEPOSITIONS  
 AND EXTENDING EXPERT  
 DISCLOSURE DEADLINES; AND  
 ORDER**

Plaintiff G.P.P., Inc. d/b/a Guardian Innovative Solutions ("Plaintiff" or "GIS") and Defendant Guardian Protection Products, Inc. ("Defendant" or "Guardian") (collectively referred to as "the parties") submit the following Joint Stipulation re: Extending the Fact Witness Discovery Deadline for the purposes of Taking Agreed Upon Fact Witness Depositions and Extending Expert Disclosure Deadlines. The parties have been diligently working to complete fact witness discovery within the May 18, 2016 deadline set by the court in its August 25, 2015 Scheduling Order. However, due to scheduling conflicts and the travel required for all of these depositions as well as the additional time needed to complete document production and review, the parties will be unable to complete all of the agreed upon depositions of party witnesses prior to the fact witness discovery cut-off date. Accordingly, the parties will also be unable to complete expert disclosure prior to the current expert disclosure deadlines. Therefore, the parties have

1 agreed and have stipulated pursuant to Federal Rule of Civil Procedure 29 to extend the time in  
2 which to complete these party depositions to June 30, 2016. The following depositions are subject  
3 to this Stipulation: (1) Charles Gibson, Sr., (2) Debbie Gibson; (3) Frank Gibson; (4) Christopher  
4 Nolan; (5) Christopher Taylor; (6) Darrin Lease; and (7) the second FRCP 30(b)(6) deposition of  
5 Defendant Guardian based on the deposition notice served on April 26, 2016.

6 Further, the parties have agreed and stipulated to extend the time with respect to expert  
7 discovery as follows:

- 8 • Expert Disclosures: July 1, 2016
- 9 • Supplemental Expert Disclosures: July 15, 2016

10 The close for expert discovery will remain August 15, 2016.

11 Nothing in this stipulation is intended as a waiver of either party's right to seek further  
12 modification of the Court's August 25, 2015 Scheduling Order or to seek any other relief from the  
13 Court, including with respect to any discovery disputes between the parties.

14 IT IS SO STIPULATED AND AGREED TO BY ALL PARTIES:

15  
16 Dated: May 31, 2016

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

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19 By: /s/ Dylan J. Liddiard  
Dylan J. Liddiard

20 Attorneys for Plaintiff  
21 GPP, Inc. d/b/a Guardian Innovative Solutions

22  
23 Dated: May 31, 2016

GORDON & REES LLP

24  
25 By: /s/ Margaret M. Drugan  
(As authorized on 5/31/2016)  
Margaret M. Drugan

26 Attorneys for Defendant  
27 Guardian Protection Products, Inc.  
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1 **ORDER**

2 Having reviewed the above stipulation, IT IS HEREBY ORDERED that the Scheduling  
3 Order (Doc. 42) be modified as follows:<sup>1</sup>

- 4 1. The deadline for fact discovery is extended to June 30, 2016, for the following  
5 depositions: (1) Charles Gibson, Sr., (2) Debbie Gibson; (3) Frank Gibson; (4)  
6 Christopher Nolan; (5) Christopher Taylor; (6) Darrin Lease; and (7) the second  
7 FRCP 30(b)(6) deposition of Defendant Guardian, based on the deposition notice  
8 served on April 26, 2016;
- 9 2. The expert disclosure deadline is extended to July 1, 2016; and
- 10 3. The supplemental expert disclosures deadline is extended to July 15, 2016.

11 These modifications do not change any other existing scheduling deadlines, including the pretrial  
12 conference and trial dates.

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14 IT IS SO ORDERED.

15 Dated: **June 3, 2016**

**/s/ Sheila K. Oberto**  
16 UNITED STATES MAGISTRATE JUDGE

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<sup>1</sup> The Court notes that, as the date of the parties' request, the deadline to complete fact discovery, which is  
26 sought to be extended, has already expired. Scheduling orders are "not a frivolous piece of paper, idly entered,  
27 which can be cavalierly disregarded by counsel without peril." *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d  
28 604, 610 (9th Cir. 1992). Any future requests to modify the Court's Scheduling Order must be filed prior to the  
expiration of the date sought to be extended -- in addition to demonstrating good cause as required by Fed. R. Civ. P.  
16(b)(4).