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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12 FRESNO DIVISION

13 G.P.P., Inc., d/b/a GUARDIAN INNOVATIVE ) CASE NO. 1:15-cv-00321 SKO  
14 SOLUTIONS, )  
15 Plaintiff, ) **JOINT STIPULATION RE:**  
16 v. ) **EXTENDING EXPERT WITNESS**  
17 GUARDIAN PROTECTION PRODUCTS, INC. ) **DISCOVERY DEADLINE FOR**  
18 and RPM WOOD FINISHES GROUP, INC., ) **THE TAKING OF AGREED UPON**  
19 Defendants. ) **EXPERT WITNESS**  
 ) **DEPOSITIONS; AND ORDER**

20 Plaintiff G.P.P., Inc. d/b/a Guardian Innovative Solutions (“Plaintiff” or “GIS”) and  
21 Defendant Guardian Protection Products, Inc. (“Defendant” or “Guardian”) (collectively referred  
22 to as “the parties”) submit the following Joint Stipulation re: Extending the Expert Witness  
23 Discovery Deadline for the Taking of Agreed Upon Expert Witness Depositions. The parties have  
24 been diligently working to complete expert witness discovery within the August 15, 2016 deadline  
25 set by the court in its August 25, 2015, Scheduling Order for expert discovery relating to claims  
26 pre-existing the Court’s July 27, 2016, Order Granting Plaintiff’s Motion to Amend. However,  
27 due to scheduling conflicts and a dispute regarding the timeliness of an expert report offered by  
28 Guardian, the parties will be unable to complete the agreed upon depositions of expert witnesses

1 prior to the current discovery cut-off date.

2 Therefore, the parties have agreed and have stipulated pursuant to Federal Rule of Civil  
3 Procedure 29 to extend the time in which to complete these depositions to September 15, 2016.  
4 The following depositions are subject to this Stipulation: (1) Peter Wrobel; and (2) Karl Schulze.  
5 The parties respectfully request that the Court so-order the stipulation.

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

7 Dated: August 15, 2016

WILSON SONSINI GOODRICH & ROSATI

8 By: /s/ Dylan J. Liddiard  
9 Dylan J. Liddiard  
10 Attorneys for Plaintiff,  
GPP, INC. d/b/a GUARDIAN  
INNOVATIVE SOLUTIONS

11 Dated: August 15, 2016

GORDON & REES LLP

12 By: /s/ Calvin E. Davis as authorized on 8/12/16  
13 Calvin E. Davis  
14 Gary A. Collis  
15 Margaret M. Drugan  
16 Attorneys for Defendants,  
GUARDIAN PROTECTION PRODUCTS,  
17 INC. and RPM WOOD FINISHES  
GROUP, INC.

18 **ORDER**

19 Pursuant to the parties' stipulation and good cause shown, the expert discovery deadline is  
20 extended to September 15, 2016, for the depositions of (1) Peter Wrobel; and (2) Karl Schulze.

21 IT IS SO ORDERED.

22 Dated: August 17, 2016

23 /s/ Sheila K. Oberto  
24 UNITED STATES MAGISTRATE JUDGE