



1 Plaintiff, GALLO GLASS COMPANY ("Gallo"), Defendant, Cross-Claimant, and Cross-  
2 Defendant, NIKOLAUS SORG GMBH & COMPANY KG ("Sorg") and Defendant, Cross-  
3 Claimant, and Cross-Defendant, SPECIAL SHAPES REFRACTORY COMPANY, INC.  
4 ("SSRC") by and through their attorneys of record in this case, hereby stipulate and agree as  
5 follows:

6 WHEREAS this Court conducted a scheduling conference on January 10, 2017 with all parties  
7 and issued a Scheduling Conference Order ("SCO") on January 25, 2017.

8 WHEREAS In paragraph 8 of the SCO the Court expressly provided:

9 "This order represents the best estimate of the Court and parties as to the agenda most  
10 suitable to dispose of this case. If the parties determine at any time that the schedule  
11 outlined in this order cannot be met, the parties are ordered to notify the Court  
12 immediately of that fact so that adjustments made be made, either by stipulation or by  
13 subsequent status conference."

14 ALL PARTIES TO THE ABOVE-ENTITLED ACTION have cooperated and continue to  
15 cooperate with each other in discovery and attempts to mediate this case, and have agreed to and  
16 scheduled a mediation with Judge Westerfield at JAMS on May 29 and 30, 2018. Given the parties  
17 scheduled mediation, they have agreed to revised discovery deadlines as set forth below. This will  
18 allow the parties to engage in and focus on a fruitful mediation, rather than costly pre-trial  
19 preparations, to provide the best opportunity to explore resolution without the press of case deadlines.  
20 In accordance with the Court's instruction in the SCO and pursuant to agreement with all parties  
21 in the above-captioned case, the parties have agreed to the following revised dates:

- 22 • Expert Disclosure will be due July 16, 2018;
- 23 • Supplemental Expert Disclosure will be July 30, 2018;
- 24 • Non-Expert Discovery Cutoff will be September 20, 2018;
- 25 • Expert Discovery Cutoff will be December 17, 2018.

26 NOW, THEREFORE, IT IS HEREBY STIPULATED by, between and amongst the  
27 Parties, and through their respective counsel of record that the relevant discovery dates stated  
28 below be changed by court order:

- Expert Disclosure will be due July 16, 2018;

- Supplemental Expert Disclosure will be July 30, 2018;
- Non-Expert Discovery Cutoff will be September 20, 2018;
- Expert Discovery Cutoff will be December 17, 2018.

IT IS SO STIPULATED.

Dated: April 16, 2018                      CARLSON, CALLADINE & PETERSON LLP

By: /s/ Colin Munro  
COLIN MUNRO  
*Attorneys for Plaintiff*  
GALLO GLASS COMPANY

Dated: April 16, 2018                      COVINGTON & BURLING LLP

By: /s/ Martin H. Myers  
MARTIN H. MYERS  
*Attorneys for Plaintiff*  
GALLO GLASS COMPANY

Dated: April 16, 2018                      LORBER GREENFIELD & POLITO, LLP

By: /s/ Lisa Schlittner  
LISA M. CAPPELLUTI, ESQ.  
LISA G. SCHLITTNER, ESQ.  
*Attorneys for Defendant, Cross-Claimant and Cross-Defendant*  
SPECIAL SHAPES REFRACTORY COMPANY

Dated: April 16, 2018                      DUANE MORRIS, LLP

By: /s/ Robert C. Hendrickson  
ROBERT C. HENDRICKSON, ESQ.  
BRENDEN RUDDY, ESQ.  
*Attorneys for Defendant, Cross-Claimant, and Cross-Defendant*  
NIKOLAUS SORG GMBH & COMPANY KG

Dated: April 16, 2018                      HALL HUGUENIN

By: /s/ Joshua Willert

1 JOSHUA H. WILLERT, ESQ.  
2 *Attorneys for Defendant, Cross-Claimant, and Cross-*  
3 *Defendant*  
4 NIKOLAUS SORG GMBH & COMPANY KG

4 **ORDER**

5 The Court, having duly considered the stipulation of the Parties as set forth above, and  
6 good cause appearing therefore, orders that the Parties deadlines shall be amended as follows:

7 Expert Disclosure will be due July 16, 2018;

8 Supplemental Expert Disclosure will be due July 30, 2018;

9 Non-Expert Discovery Cutoff will be September 20, 2018;

10 Expert Discovery Cutoff will be December 17, 2018

11 No further extensions will be granted absent good cause. All other dates in the Scheduling  
12 Order remain in effect.

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14 IT IS SO ORDERED.

15 Dated: April 16, 2018

16 /s/ Barbara A. McAuliffe  
17 UNITED STATES MAGISTRATE JUDGE

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