

1 Jeffrey W. Shopoff (Bar No. 46278)
 Gregory S. Cavallo (Bar No. 173270)
 2 Paul F. Kirsch (Bar No. 127446)
 James M. Robinson (Bar No. 238063)
 3 SHOPOFF CAVALLO & KIRSCH LLP
 100 Pine Street, Suite 750
 4 San Francisco, CA 94111
 Telephone: (415) 984-1975
 5 Facsimile: (415) 984-1978

6 Attorneys for Plaintiff
 California Natural Products

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 CALIFORNIA NATURAL PRODUCTS
 (d/b/a POWER AUTOMATION SYSTEMS),
 12 a California corporation,
 13 Plaintiff,
 14 vs.
 15 ILLINOIS TOOL WORKS, INC. (d/b/a
 HARTNESS INTERNATIONAL, INC.), a
 16 Delaware corporation,
 17 Defendant.

CASE NO. 2:12-cv-0593-JAM-CKD

**STIPULATION AND ORDER TO
 CONTINUE TRIAL AND PRE-TRIAL
 SCHEDULE
 (AS MODIFIED BY THE COURT)**

18
 19 Plaintiff California Natural Products and Defendant Illinois Tool Works hereby stipulate and
 20 jointly request that the Court continue the current trial schedule to allow an additional approximately
 21 60 days, with the pre-trial dates adjusted as well. Good cause for such a continuance is based on the
 22 following:

23 As the parties indicated in their last request to extend the schedule (Docket No. 84), they
 24 have agreed to mediate this case. The mediation was set for January 22, 2014, with mediator Bill
 25 Hartgering of JAMS in Chicago. In advance of the mediation, the parties submitted extensive
 26 mediation briefs and fully prepared and planned to mediate the case in good faith.

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1 Unfortunately, only a couple of days prior to the mediation, Plaintiff's principal and business
 2 person with extensive knowledge of the facts, who was scheduled to travel from California to
 3 Chicago for the mediation, became seriously ill, requiring a visit to the hospital and several doctors'
 4 appointments. The parties agree this person's personal involvement is critical to the mediation. He
 5 will be undergoing surgery in the near term, with a several-week recovery period. As a result, the
 6 parties have rescheduled the mediation for March 11, 2014, the earliest possible date. As the parties
 7 previously indicated, they seek to focus their efforts on trying to resolve this matter at the mediation
 8 and avoid the costs associated with fact depositions and expert disclosures.

9 To allow the parties to continue to focus on the upcoming mediation, the parties have
 10 cooperated in drafting a revised schedule for the Court's consideration. This schedule proposes
 11 adjusting the trial date by approximately 60 days, with interim dates adjusted as well by agreement.
 12 The revised schedule remains within the Court's typical schedule.

Event	Current	Proposed
Mid-litigation statement to the court (status of all motions already filed and likelihood of future motions)	Fri., May 16, 2014	Wed., July 16, 2014
Expert disclosure, including report	Thu., June 26, 2014	Tue., Aug. 26, 2014
Close of fact discovery	Fri., July 11, 2014	Thu., Sept. 11, 2014
Rebuttal expert disclosure, including report	Thu., July 17, 2014	Wed., Sept. 17, 2014
Close of expert discovery	Fri., Aug. 8, 2014	Wed., Oct. 8, 2014
Dispositive motions	Fri., Aug. 29, 2014	Wed., Oct. 29, 2014
Dispositive motion responses	Fri., Sept. 19, 2014	Wed., Nov. 19, 2014
Dispositive motion replies	Fri., Oct. 3, 2014	Wed., Dec. 3, 2014
Hearing on dispositive motions	Wed., Oct. 15, 2014 at 9:30 a.m.	Wed., Dec. 17, 2014 at 9:30 a.m.
Joint pretrial statement	Wed., Dec. 10, 2014	Tue., Feb. 13, 2015
Final pretrial conference	Wed., Dec. 17, 2014 at 3:00 p.m.	Tue., Feb. 20, 2015 at 11:00 a.m.
Trial	Mon., Feb. 9, 2015 at 9:00 a.m.	Mon. Apr. 20, 2015 at 9:00 a.m.

1 For the reasons set forth in this Stipulation, the parties respectfully request that the Court
2 enter the proposed schedule set forth above.

3 Respectfully submitted,

4 DATED: February 6, 2014

SHOPOFF CAVALLO & KIRSCH LLP

5 By /s/ Gregory S. Cavallo
6 Gregory S. Cavallo
7 Attorneys for Plaintiff
8 CALIFORNIA NATURAL PRODUCTS
9 (d/b/a POWER AUTOMATION SYSTEMS)

10 DATED: February 6, 2014

GRIPPO & ELDEN LLC

11 By /s/ Lynn H. Murray
12 Lynn H. Murray
13 Attorneys for Defendant
14 ILLINOIS TOOL WORKS, INC.

15 DATED: February 6, 2014

POOLE & SHAFFERY, LLP

16 By /s/ David S. Poole
17 David S. Poole
18 Attorneys for Defendant
19 ILLINOIS TOOL WORKS, INC.

ORDER

20 IT IS SO ORDERED.

21 DATED: 2/6/2014

/s/ John A. Mendez
United States District Court Judge