

1 STIMMEL, STIMMEL & SMITH  
 A Professional Corporation  
 2 LEE D. STIMMEL, ESQ. (State Bar No. 58405)  
 e-mail: [lstimmel@stimmel-law.com](mailto:lstimmel@stimmel-law.com)  
 3 155 Montgomery Street, 12th Floor  
 San Francisco, California 94104-3973  
 Telephone: (415) 392-2018  
 4 Facsimile: (415) 391-2124

5 ARCHER NORRIS LLP  
 SETH J. SCHWARTZ (State Bar No. 103357)  
 6 e-mail: [sschwartz@archernorris.com](mailto:sschwartz@archernorris.com)  
 2033 North Main Street, Suite 800  
 7 Walnut Creek, CA 94596  
 Telephone: (925) 930-6600  
 8 Facsimile: (925) 930-6620

9 Attorneys for Plaintiffs and Cross-Defendants  
 KRISTI VERMA, VISHAL VERMA AND ZENTEK  
 10 CORPORATION, a California Corporation,  
 11

12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA

14 KRISTI VERMA, et al.

15 Plaintiffs,

16 v.

17 EFRAT OKEV, et al.

18 Defendants.

19 EFRAT OKEV, et al.

20 Counterclaimants,

21 v.

22 KRISTI VERMA, et al,

23 Counterdefendants.  
 24

Case No. 2:13-CV-00865-MCE-EFB

**STIPULATION AND ORDER TO  
 EXTEND CUTOFF FOR DISCOVERY  
 AND DISCOVERY MOTION**

1 Plaintiffs and Counterdefendants Kristi Verma, Vishal Verma, and Zentek Corporation  
2 (collectively, “Plaintiffs”) requested a 60-day extension of time to hold open non-expert  
3 discovery. Defendants and counterclaimants are amenable to such an extension.

4 The parties attended a settlement conference in this lawsuit for breach of fiduciary duty,  
5 misappropriation of corporate assets and other related causes of action, in addition to a cross-  
6 complaint for involuntary corporate dissolution and indemnification, on June 9, 2014. The case  
7 did not settle at that time. The case involves voluminous and extensive electronic discovery being  
8 sought by both sides. There are numerous witnesses; the defendants live in St. Louis, Missouri.  
9 Counsel are in the process of exchanging documents, meeting and conferring re documents and  
10 working to set the parties’ depositions, including those in the Midwest. The parties need an  
11 opportunity to analyze the documents before going forward with the depositions. Thousands of  
12 pages of documents are involved. Further, it may be necessary to notice additional depositions of  
13 several other witnesses, also located in the Midwest, depending on the parties’ deposition  
14 testimony.

15 Defendants have produced thousands of pages of imaged documents that are being  
16 reviewed and in excess of 51,000 electronic files and may produce additional files. Plaintiffs are  
17 in the process of producing significant volumes of ESI. Each side is working with computer  
18 consultants to expedite the discovery of ESI and to minimize the cost. The parties have worked  
19 diligently to identify the relevant and responsive discovery materials, including ESI, and are  
20 working cooperatively to prepare the case for trial.

21 Counsel have agreed on a 60 day discovery extension. This extension will not interfere  
22 with any of the court’s pre—trial dates.

23 Accordingly, pursuant to Rule 16(b) and Rule 29 of the Federal Rules of Civil Procedure,  
24 the parties, by and through their undersigned counsel of record, hereby collectively agree and  
25 stipulate to the following:

26 1. The time for all parties to complete non-expert discovery shall be extended to  
27 October 21, 2014.

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Dated: July 21, 2014

**ARCHER NORRIS, PLC**

By: /s/ SETH J. SCHWARTZ  
**ORIGINAL SIGNATURE ON ECF-SUBMITTED  
VERSION**  
Seth J. Schwartz  
Co-Counsel for Plaintiffs and Counterdefendants  
Kristi Verma, Vishal Verma, and Zentek Corporation

Dated: July 21, 2014


**PFEIFFER FITZGIBBON & ZIONTZ LLP**

By: /s/ THOMAS N. FITZGIBBON  
Thomas N. FitzGibbon  
Attorneys for Defendants and Counterclaimants  
Efrat Okev and Lloyd Burton

**ORDER**

**IT IS SO ORDERED.**

Dated: July 28, 2014

  
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MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT COURT