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 10 GILBERT and TREVOR GILBERT

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18 Counsel for Plaintiff
 19 PORTESCAP INDIA PVT LTD

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**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO**

18 PORTESCAP INDIA PVT LTD, an
 19 India private company limited by
 20 shares,

21 Plaintiff,

22 vs.

23 BIONICA, INC., a Nevada
 24 corporation; TRINA HEALTH LLC,
 25 a Nevada limited liability company;
 26 GREGORY FORD GILBERT;
 27 TREVOR GILBERT; and DOES 1-
 28 10, inclusive,

Defendants.

CASE NO.: 2:19-CV-00865-TLN-KJN

**STIPULATION AND ORDER RE:
 DISCOVERY DISPUTE OVER
 DEFENDANTS' FAILURE TO
 RESPOND TO DISCOVERY**

[Discovery Matter]

1 Pursuant to Rule 37(a)(3)(B) of the Fed. R. Civ. P., the parties respectfully
2 stipulate and request the Court to order that Defendants Bionica, Inc., Trina Health
3 LLC, Gregory Ford Gilbert and Trevor Gilbert be compelled to provide the
4 following discovery no later than September 14, 2020:
5

- 6 1. Service of a written response to Plaintiff's First Set of Interrogatories dated
7 July 31, 2020, signed by counsel under Rule 26(g) and verified under oath
8 by each of the Defendants, containing a complete and straightforward
9 answer to each of the interrogatories, without objection.
- 10 2. Production to Plaintiff Portescap India Pvt. Ltd. of all documents within the
11 possession, custody or control of the Defendants that are responsive to
12 Plaintiff's First Set of Requests for Production of Documents and Things
13 dated July 31, 2020.
- 14 3. Service of a written response to Plaintiff's First Set of Requests for
15 Production of Documents and Things, signed by counsel under Rule 26(g),
16 stating that all responsive documents have been produced as requested and
17 without objection.

18 Respectfully submitted,

19 Dated: September 7, 2020

LAW OFFICE OF DAVID S. BARRETT

20 By: /s/ David S. Barrett
21 David S. Barrett

22 Counsel for Defendants BIONICA, INC., TRINA
23 HEALTH LLC, GREGORY FORD GILBERT
24 and TREVOR GILBERT

25 Dated: September 7, 2020

KOHN LAW GROUP, INC.

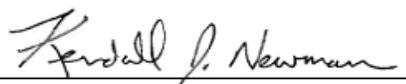
26 By: /s/ Robert E. Kohn
27 Robert E. Kohn

28 Counsel for Plaintiff PORTESCAP INDIA PVT
LTD

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IT IS SO ORDERED.
Dated: September 14, 2020

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KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE