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8 Attorneys for Plaintiff Zoom Imaging Solutions, Inc.

9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11
12 ZOOM IMAGING SOLUTIONS, INC.,

13 Plaintiff,

14 v.

15 EDWARD ROE; MAXWELL RAMSAY;
16 JON CROSSEN; CORINNE FUERST;
ANDREW ALSWEET; KEVIN TOON;
17 JASON PEEBLER; ABIGAIL NEAL;
POWER BUSINESS TECHNOLOGY LLC;
18 BRYAN DAVIS; MAURA LOPEZ;
JEFFREY ORLANDO; JESSICA HINTZ
19 and DOES 1 through 100, inclusive,

20 Defendants.

Case No. 2:19-CV-01544-WBS-KJN

**STIPULATION TO EXTEND EXPERT
DISCOVERY DEADLINE; ORDER**

Complaint Filed: August 9, 2019
Trial Date: None Set
Judge: Hon. William B. Shubb
Magistrate Judge: Hon. Kendal J. Newman

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22 Plaintiff Zoom Imaging Solutions, Inc. (“Plaintiff”) and Defendants Edward Roe, Max
23 Ramsay, Jon Crossen Corinne Fuerst, Andy Alsweet, Kevin Toon, Jason Peebler, Abigail Neal,
24 Power Business Technology LLC, Bryan Davis, Maura Lopez, Jeffrey Orlando and Jessica Hintz
25 (“Defendants”) hereby stipulate and respectfully request an Order modifying the Court’s Scheduling
26 Order dated February 13, 2020, [Dkt. No. 90], to extend the deadline for the parties to disclose
27 experts and produce reports until March 25, 2021 and, with respect to experts intended solely for
28 rebuttal, to extend the deadline for the parties to disclose experts and produce reports until April 22,

1 2021. The current deadlines are February 12, 2021 and March 12, 2021, respectively. Plaintiff and
2 Defendants (the “Parties”), through their respective counsel, hereby stipulate and agree to the
3 following:

4 WHEREAS, Plaintiff commenced this action against Defendants by filing a Complaint on
5 August 9, 2019;

6 WHEREAS, Plaintiff served and filed its Amended Complaint on November 29, 2019;

7 WHEREAS, the Parties have conducted, and continue to conduct, fact discovery;

8 WHEREAS, Plaintiff believes there is additional fact discovery it must conduct so as to allow
9 its experts sufficient time to prepare their reports;

10 WHEREAS, Defendants agree to stipulate to extend the expert discovery deadlines;

11 WHEREAS, good cause exists to extend the expert discovery deadline of this matter as all
12 Parties have stipulated to this continuance and the interests of justice are best served by the brief
13 continuance, which will allow the Parties additional time to evaluate the merits of this action and to
14 prepare their respective experts for trial.

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties
16 as follows:

17 The deadline for the parties to disclose experts and produce reports is extended to March 25,
18 2021 and, with respect to experts intended solely for rebuttal, the deadline for the parties to disclose
19 experts and produce reports is extended to April 22, 2021.

21 DATED: January 5, 2021

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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23
24 By: /s/ _____

25 David A. Garcia
26 Graham M. Hoerauf
27 Carlos Bacio
28 Attorneys for Plaintiff
Zoom Imaging Solutions, Inc.

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DATED: January 5, 2021

STOEL RIVES LLP

By: /s/ _____
Thomas A. Woods
Christopher L. Russell
Nicholas Karkazis
Attorneys for Defendants
Edward Roe and Power Business Technology,
LLC

DATED: January 5, 2021

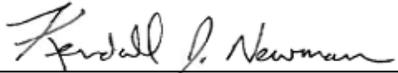
PORTER SCOTT, APC

By: /s/ _____
Martin N. Jensen
Jeffrey A. Nordlander
Attorneys for Defendants
Max Ramsay, erroneously sued as Maxwell
Ramsay, Jon Crossen, Corrine Fuerst, Andy
Alsweet, erroneously sued as Andrew Alsweet,
Kevin Toon, Jason Peebler, Abigail Neal, Bryan
Davis, Jessica Hintz, Maura Lopez and Jeffrey
Orlando

ORDER

The Court, having reviewed the Parties' Joint Stipulation to extend expert discovery, and with good cause present, IT IS ORDERED THAT the deadline for the parties to disclose experts and produce reports is extended to March 25, 2021 and, with respect to experts intended solely for rebuttal, the deadline for the parties to disclose experts and produce reports is extended to April 22, 2021.

Dated: January 7, 2021



KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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PROOF OF SERVICE
Zoom Imaging Solutions, Inc. v. Edward Roe, et al.
Case No. 2:19-CV-01544-WBS-KJN

I am and was at all times herein mentioned over the age of 18 years and not a party to the action in which this service is made. At all times herein mentioned I have been employed in the County of Orange in the office of a member of the bar of this court at whose direction the service was made. My business address is 695 Town Center Drive, Suite 1500, Costa Mesa, CA 92626.

On January 7, 2021, I served the following document(s):

STIPULATION TO EXTEND EXPERT DISCOVERY DEADLINE; [PROPOSED] ORDER

by placing (the original) (a true copy thereof) in a sealed envelope addressed as follows:

BY MAIL: I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Ogletree, Deakins, Nash, Smoak & Stewart P.C.'s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY FACSIMILE: by transmitting a facsimile transmission a copy of said document(s) to the following addressee(s) at the following number(s), in accordance with:

- the written confirmation of counsel in this action:
- [Federal Court]** the written confirmation of counsel in this action and order of the court:

BY CM/ECF: With the Clerk of the United States District Court of California, using the CM/ECF System. The Court's CM/ECF System will send an e-mail notification of the foregoing filing to the parties and counsel of record who are registered with the Court's CM/ECF System.

(Federal) I declare that I am employed in the office of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

(Federal) I declare that I am a **member** of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on January 7, 2021, at Costa Mesa, California.

_____/s/_____

Theresa Fontes

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MAURA LOPEZ, and JEFFREY ORLANDO