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

10 SOURDOUGH & CO., INC.,

11 Plaintiff,

12 v.

13
 14 WCSD, INC., a California corporation; GSD
 FOODS, INC., a California corporation;
 15 GURMINDER BHATIA, an individual;
 DAVINDER SINGH, an individual;
 16 POWERGLIDE HOLDINGS, LLC, a California
 limited liability company; KALDEEP UPPAL, an
 17 individual; KARNDEEP UPPAL, an individual;
 and SD-FOLSOM, INC., a California corporation;
 18 and DOES 1-25,

19 Defendants.

20 _____
 21 WCSD, INC., a California corporation,

22 Counter-Claimant,

23 v.

24 SOURDOUGH & CO., INC., a California
 25 corporation,

26 Counter-Defendant.
 27 _____

Case No. 2:20-cv-01226-TLN-CKD

**STIPULATION AND ORDER FOR
 MODIFICATION OF INITIAL
 PRETRIAL SCHEDULING ORDER**

1 Plaintiff Sourdough & Co., Inc., Defendant/Plaintiff/Counter-Claimant WCSD, Inc. and
2 Defendants GSD-Foods, Inc., Gurminder Bhatia, Davinder Singh, Powerglide Holdings, LLC, Kaldeep
3 Uppal, Karndeepp Uppal, SD-Folsom, Inc. and David Bagley through their respective attorneys of record
4 in this consolidated proceeding, hereby stipulate to modification of the Court’s April 1, 2021 Order Upon
5 Stipulation [Docket No. 30] as set forth below.

6 WHEREAS, Plaintiff WCSD, Inc. filed its *In Rem* Complaint for Declaratory and Injunctive
7 Relief in the United States District Court, Eastern District of Virginia, Alexandria Division, Case No.
8 1:20-cv-00629 (the “Domain Name Proceeding”) on June 4, 2020;

9 WHEREAS, Plaintiff Sourdough & Co., Inc. filed its Complaint in the United States District
10 Court, Eastern District of California, Sacramento Division, Case No. 2:20-cv-01226 (the “Trademark
11 Proceeding”) on June 17, 2020;

12 WHEREAS, the Court entered its Initial Scheduling Order in this proceeding on June 18, 2020
13 [Docket No. 3];

14 WHEREAS, the Domain Name Proceeding matter was transferred to the United States District,
15 Eastern District of California, Sacramento Division, on or around July 30, 2020;

16 WHEREAS, on April 1, 2021, the Domain Name Proceeding and the Trademark Proceeding were
17 consolidated by the Court’s Order Upon Stipulation [Docket No. 30], which also modified the Initial
18 Scheduling Order to set the following deadlines;

- 19 1. November 30, 2021: Discovery cut-off;
- 20 2. January 31, 2022: Disclosure of expert witnesses; and
- 21 3. February 28, 2022: Supplemental designation of expert witnesses.

22 WHEREAS, the parties have engaged in good-faith settlement negotiations for the past several
23 weeks and, in view of the substantial fees and costs that would be incurred by each party in conducting
24 further discovery (including party and non-party depositions), the parties have refrained from moving
25 forward with discovery while such settlement discussions were pending;

26 WHEREAS, the parties anticipate that certain discovery and disputes may need to be presented
27 to the Court and that Plaintiff Sourdough & Co., Inc. may seek leave to amend the complaint to add
28 additional defendants; and

1 WHEREAS, in light of the above, the parties have agreed to extend the deadlines for discovery
2 cut-off, disclosure of expert witnesses and supplemental disclosure of expert witnesses.

3 NOW THEREFORE, the parties hereby stipulate and agree as follows:

- 4 1. Plaintiff may file a First Amended Complaint no later than January 10, 2022.
- 5 2. Defendants may file Counterclaim(s) (or First Amended Counterclaim(s), if applicable)
6 in conjunction with their Answer(s) to Plaintiff's First Amended Complaint.
- 7 3. To extend percipient discovery cut-off from November 30, 2021 to May 31, 2022.
- 8 4. To extend disclosure of expert witness deadline from January 31, 2022 to July 30, 2022.
- 9 5. To extend disclosure of supplemental witnesses from February 28, 2022 to August 31,
10 2022; and
- 11 6. That all other deadlines shall be calculated as reflected in the Court's Initial Scheduling
12 Order.

13
14 Dated: January 6, 2022

PETERSON WATTS LAW GROUP, LLP

15 /s/ Glenn Peterson

16 Glenn W. Peterson
17 Jeffrey Arnold
18 Attorneys for Plaintiff Sourdough & Co.,
Inc. and Defendant David Bagley

19 Dated: January 6, 2022

HUGHEY PHILLIPS, LLP

20 /s/ Galen M. Gentry

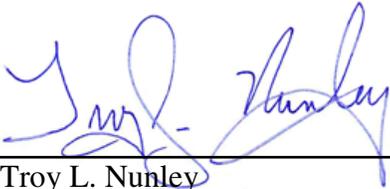
21 Kevin Hughey
22 Galen M. Gentry
23 Attorneys for Defendant/Plaintiff/Counter-
24 Claimant WCSD, Inc. and Defendants GSD-
25 Foods, Inc., Gurminder Bhatia, Davinder
26 Singh, Powerglide Holdings, LLC, Kaldeep
27 Uppal, Karndeepp Uppal and SD-Folsom,
28 Inc.

1 **ORDER UPON STIPULATION:**

2 Pursuant to the parties' Stipulation for Modification of Initial Scheduling Order and good
3 cause appearing therefor, the Court hereby orders that the Initial Scheduling be modified as set
4 forth above.

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

6 Dated: January 6, 2022

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9 Troy L. Nunley
10 United States District Judge

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