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Attorneys for Defendant  
PRAVEEN CHAKRAVARTY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

THOMAS WEISEL PARTNERS LLC, a  
Delaware limited liability company, and  
THOMAS WEISEL INTERNATIONAL  
PRIVATE LIMITED, an Indian company,

Plaintiffs,

v.

BNP PARIBAS, a French corporation, BNP  
PARIBAS SECURITIES (ASIA) LIMITED,  
a Hong Kong company, and PRAVEEN  
CHAKRAVARTY, an individual,

Defendants.

Case No. 3:07-cv-06198-MHP

**STIPULATED REQUEST FOR AN ORDER  
EXTENDING DISCOVERY DEADLINES AND  
~~PROPOSED~~ ORDER (Local Rule 6-2)**

1 Pursuant to Civil Local Rule 6-2, IT IS HEREBY STIPULATED by and between the  
2 parties hereto through their respective attorneys of record that, if the Court approves, the current  
3 discovery deadlines in the above-captioned case be extended as set forth below. The stipulation  
4 is based on the following:

5 1. The parties have not yet completed depositions. Several factors have contributed  
6 to the parties' inability to complete depositions by the current deadline of September 30, 2009.  
7 First, scheduling depositions in this case has required greater than usual coordination of parties'  
8 schedules because of the international travel required for all of the defendants' witnesses, which  
9 has included obtaining of visas and coordinating trips spanning over several days. Second,  
10 counsel for defendant Chakravarty filed a substitution of counsel on or about August 27, and has  
11 needed some additional time review tens of thousands of pages of documents in order to get up  
12 to speed in the case. Third, the parties had continuously worked in an attempt to resolve several  
13 disputes regarding the production of documents which pertain to the percipient witness  
14 depositions in this case.

15 2. Because of these facts, the parties have been unable to complete all fact witness  
16 depositions by the current deadline of September 30, 2009. Accordingly, the parties request a  
17 43-day extension—to November 13, 2009—of the current deadline to complete percipient  
18 witness depositions. During the proposed extension period, Plaintiffs anticipate completing the  
19 party depositions of Praveen Chakravarty, Phillippe Ditisheim, and Defendants BNP Paribas and  
20 BNP Paribas Securities (Asia) Limited. Defendants anticipate completing the party depositions  
21 of Mark Fisher, Thomas Weisel, Keith Gay, Plaintiffs Thomas Weisel and Thomas Weisel  
22 International Private Limited, and non party depositions of KV Dhillon, David Baylor, and  
23 Mike McCarthy.

24 3. The change in deadline to depose percipient witnesses necessitates a change in the  
25 deadline for the exchange of expert reports (from October 30, 2009 to December 9, 2009) and to  
26 exchange expert rebuttal reports (from November 30, 2009 to January 11, 2009).

27 4. The parties have previously requested only one extension to Court-ordered  
28

1 deadlines. The proposed extensions to the discovery deadlines will not affect the close of expert  
2 discovery or close of fact discovery deadlines, the deadline to hear motions or the trial date set  
3 by the Court.

4 5. The current schedule and the proposed revised schedule that the parties have  
5 stipulated to are shown in the chart below.

6 Pretrial Deadline	Current Schedule	Stipulated Proposed Schedule
7 Last day for percipient witness depositions	9/30/09	11/13/09
8 Exchange of expert reports	10/30/09	12/9/09
9 Exchange of expert rebuttal reports	11/30/09	1/11/10
10 Close of expert discovery	12/31/09	1/29/10
11 Discovery cut-off	1/29/10	1/29/10
12 Deadline to hear motions	3/15/10	3/15/10
13 Trial	5/11/10	5/11/10

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16 6. The parties respectfully request that the Court grant their request.

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19 Dated: October 2, 2009

DURIE TANGRI LLP

20 By: /s/Johanna Calabria

21 Johanna Calabria

22 Attorneys for Defendant PRAVEEN CHAKRAVARTY

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24 DAVIS WRIGHT TERMAINE LLP

25 By: /s/Joseph E. Addiego III

26 Joseph E. Addiego III

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-and-

CLIFFORD CHANCE US LLP

By: /s/Steven T. Cottreau

\_\_\_\_\_  
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\_\_\_\_\_  
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Attorneys for Plaintiffs  
THOMAS WEISEL PARTNERS LLC and  
THOMAS WEISEL INTERNATIONAL PRIVATE  
LIMITED

**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X (B) regarding signatures, I, Johanna Calabria, attest that concurrence in the filing of this document has been obtained.

\_\_\_\_\_  
/s/ Johanna Calabria

Johanna Calabria

IT IS SO ORDERED:

Dated: October 5, 2009

  
\_\_\_\_\_

Hon. Marilyn Hall Patel  
United States District Judge

**CERTIFICATE OF SERVICE**

I certify that all counsel of record are being served on October 2, 2009 with a copy of this document via the Court's CM/ECF system.

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By: /s/ Johanna Calabria  
Johanna Calabria

Attorneys for Defendant Praveen Chakravarty