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AUTONOMY CORPORATION PLC

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

18 GA ESCROW, LLC, a Delaware limited
liability company, as Representative for the
19 Escrow Participants,
20 Plaintiff,
21 v.
22 AUTONOMY CORPORATION PLC, a
corporation formed under the laws of
23 England and Wales,
24 Defendant.

Case No. C08-01784-SI

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF DISCOVERY
CUTOFF AND MODIFICATION OF
PRETRIAL PREPARATION ORDER**

Dept.: 10

Judge: The Honorable Susan Illston

1 Plaintiff GA Escrow, LLC (“GA Escrow” or “Plaintiff”) and defendant Autonomy
2 Corporation PLC (“Autonomy” or “Defendant”) respectfully submit this Stipulation and
3 Proposed Order for Extension of Discovery Cutoff and Modification of Pretrial Preparation
4 Order.

5 **1. Settlement and ADR.**

6 The parties have participated in three settlement conferences before Judge Spero - the first
7 on August 18, 2009, the second on October 7, 2009, and the third of March 4, 2010. Although no
8 settlement has been reached, the parties agreed to continue to discuss the possibility for a
9 resolution of this matter, and agreed to schedule an additional conference before Judge Spero
10 either following expert discovery or after the filing of dispositive motions.

11 **2. Scheduling.**

12 On September 8, 2009, this Court, pursuant to a stipulation of the parties, signed an order
13 staying all discovery and corresponding discovery deadlines in this matter. On December 14,
14 2009, the Court signed a Second Pretrial Preparation Order setting new discovery deadlines and a
15 trial date of July 26, 2010. A copy of that order is attached hereto as Exhibit A. Consistent with
16 that order Non-Expert Discovery is to close Friday, March 12, 2010. Due to a death in the family
17 of Plaintiff’s counsel, depositions in New York scheduled for the week of March 8, 2010 had to
18 be rescheduled. This also has required the rescheduling of other depositions. Counsel for
19 defendant graciously has agreed to stipulate to a two week extension of the fact discovery cutoff
20 and corresponding expert discovery deadlines to accommodate these rescheduled depositions.
21 The requested modification does not impact the date for filing dispositive motions or the trial
22 date. As such, the parties respectfully request that the Pretrial Preparation Order be modified to
23 conform to the following revised case schedule:

24	Fact discovery closes:	March 31, 2010
25	Expert disclosures:	April 9, 2010
26	Rebuttal expert disclosures:	April 23, 2010
27	Expert discovery closes:	May 4, 2010

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1 Last day to file dispositive motions: May 14, 2010
2 Opposition Due: May 28, 2010
3 Reply Due: June 4, 2010
4 Hearing Date no later than: June 18, 2010
5 Pretrial Conference: July 13, 2010
6 Trial: July 26, 2010

7 DATED: March 5, 2010

SHARTSIS FRIESE LLP

8 By: /s/ Gregg S. Farano
9 GREGG S. FARANO
10 Attorneys for Plaintiff
GA ESCROW, LLC

11 DATED: March 5, 2010

DOLL AMIR & ELEY LLP

12 By: /s/ Gregory Lawrence Doll
13 (with permission)
14 GREGORY LAWRENCE DOLL
Attorneys for Defendant
AUTONOMY CORPORATION PLC

15 **ORDER**

16 Pursuant to the parties' stipulation, and good cause appearing therefore, IT IS HEREBY
17 ORDERED that the following case schedule be adopted:

- 18 1. The Parties shall complete non-expert discovery no later than March 31, 2010.
- 19 2. The Parties shall designate experts no later than April 9, 2010.
- 20 3. The Parties shall designate rebuttal experts no later than April 23, 2010;
- 21 4. The Parties shall complete expert discovery no later than May 4, 2010;
- 22 5. The Parties shall file dispositive motions no later than May 14, 2010;
- 23 6. The Pre-Trial Conference for this matter will take place on July 13, 2010; and
- 24 7. The Trial for this matter will commence on July 26, 2010.

25 **IT IS SO ORDERED.**

26 Dated: _____

27 
28 The Honorable Susan Illston
United States District Judge

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ECF CERTIFICATION

I, Gregg S. Farano, am the ECF User whose identification and password are being used to file this Stipulation and Proposed Order for Extension of Discovery Cutoff and Modification of Pretrial Preparation Order. In compliance with General Order 45.X.B, I hereby attest that Gregory Lawrence Doll has concurred in this filing.

DATED: March 5, 2010 SHARTSIS FRIESE LLP

By: /s/ Gregg S. Farano
GREGG S. FARANO
Attorneys for Plaintiff
GA ESCROW, LLC

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