

1 Brady Law Group
 Steven J. Brady (SBN 116651)
 2 1015 Irwin Street, Suite A
 San Rafael, CA 94901
 3 Telephone: (415) 459-7300
 4 Facsimile: (415) 459-7303

5 Richard L. Katz, Inc.
 Richard L. Katz (SBN 42902)
 6 P.O. Box 2310
 Mill Valley, CA 94942-2310
 7 Telephone: (415) 407-4693
 8 Facsimile: (815) 346-5780

9 Attorneys for Plaintiff Sussex Financial Enterprises, Inc.

10 Kasowitz, Benson, Torres & Friedman LLP
 Mark P. Ressler (admitted *pro hac vice*)
 11 Ronald R. Rossi (admitted *pro hac vice*)
 12 Seth Davis (admitted *pro hac vice*)
 1633 Broadway
 13 New York, NY 10019
 Telephone: (212) 506-1700
 14 Facsimile: (212) 506-1800

15 Attorneys for Defendants
 16 Bayerische Hypo- und Vereinsbank AG
 and HVB U.S. Finance, Inc.

17
 18 **IN THE UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
 19 **SAN FRANCISCO DIVISION**

20 SUSSEX FINANCIAL ENTERPRISES, INC,

21 Plaintiff,

22 vs.

23 BAYERISCHE HYPO- UND VEREINSBANK AG,
 aka HYPOVEREINSBANK; *et al.*,

24
 25
 26
 27 Defendants.

CASE NO. C-08-4791 SC

JOINT STIPULATION AND
[PROPOSED] ORDER
RE SCHEDULING OF
EXPERT DISCLOSURES
AND DEPOSITIONS

1 Plaintiff Sussex Financial Enterprises, Inc. ("Sussex") and defendants Bayerische Hypo-
2 und Vereinsbank AG and HVB U.S. Finance, Inc. (collectively "HVB"), by and through their
3 respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS on February 6, 2009, the Court issued a Minute Order in which the deadline for
5 expert disclosures was set for January 31, 2010;

6 WHEREAS on February 11, 2009, the Court issued a Status Conference Order, which was
7 silent as to expert discovery;

8 WHEREAS the parties believe it would be productive and in the interests of judicial
9 economy and efficiency for the parties to obtain additional time to prepare expert disclosures;

10 IT IS HEREBY STIPULATED, and the parties respectfully and in good faith request, that
11 the Court orders as follows:

- 12 1. Expert disclosures shall be made by March 1, 2010.
- 13 2. Depositions of the parties' experts shall take place beginning no earlier than March 15,
14 2010 and must be completed by March 24, 2010, unless the parties mutually agree otherwise.
- 15 3. The stipulation shall not impact any other dates set forth by the Court in the Status
16 Conference Order, dated February 11, 2009.

17 Dated: January 19, 2010

Brady Law Group
Steven J. Brady
Richard L. Katz, Inc.
Richard L. Katz

21 By: Richard L. Katz by RRR
22 Attorneys for Plaintiff

23 Dated: January 19, 2010

Kasowitz, Benson, Torres & Friedman LLP
Mark P. Ressler
Ronald R. Rossi
Seth Davis

26 By: [Signature]
27 Attorneys for Defendants

