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7 Attorneys for Plaintiff,
 SARAH KIM

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

13 SARAH KIM, Individually and as Successor
 in Interest to RICHARD D. BAE, D.D.S.,
 Deceased,

14 Plaintiff,

15 vs.

16 INTERDENT, INC., a Delaware
 17 corporation, a/k/a INTERDENT SERVICE
 CORPORATION, a Washington
 18 corporation, a/k/a GENTLE DENTAL, a/k/a
 MOUNTAIN VIEW DENTAL, a/k/a BLUE
 19 OAK DENTAL GROUP, a/k/a
 DEDICATED DENTAL, a/k/a
 20 AFFORDABLE DENTAL CARE, a/k/a
 CAPITAL DENTAL, and DOES 1-50,
 21 inclusive,

22 Defendants.

Case No. CV-08-5565-SI

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING THE EXPERT
 DISCOVERY CUT-OFF DATE**

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1 Plaintiff, Sarah Kim, Individually and as Successor in Interest to Richard D. Bae, D.D.S.,
2 Deceased (“plaintiff”), and defendants, Interdent, Inc., a Delaware corporation, a/k/a Interdent
3 Service Corporation, a Washington corporation, a/k/a Gentle Dental, a/k/a Mountain View
4 Dental, a/k/a Blue Oak Dental Group, a/k/a Dedicated Dental, a/k/a Affordable Dental Care, and
5 a/k/a Capital Dental (collectively, “defendants”), by and through their respective attorneys of
6 record, hereby jointly request that this Court issue an order, as set forth below, extending the date
7 for the close of expert discovery, as well as the date for the parties to file any motions to compel
8 as to expert discovery.

9 1. Expert discovery is currently set to close on Monday, June 28, 2010.

10 2. The parties have scheduled the depositions of the eleven (11) total experts, but,
11 due to scheduling conflicts among counsel and the expert witnesses, the parties will not be able
12 to complete all of the depositions before June 28, 2010.

13 3. Two expert depositions have already occurred. The remaining expert depositions
14 are scheduled as follows:

15 a. Steven B. Kupferman, D.M.D., M.D. and Neal L. Benowitz, M.D. on June
16 on June 29, 2010.

17 b. Shiraz Buhari, M.D. on June 30, 2010.

18 c. Dr. John M. Greene, M.D. and Michael E. Cadra, M.D., D.M.D. on July 1,
19 2010.

20 d. Alfred Joseph Hurt, Jr., Pharm.D. and Dr. H. William Gottschalk, D.D.S.
21 on July 2, 2010.

22 e. Mr. Mark Cohen on July 7, 2010.

23 f. Barry Gustin, M.D., M.P.H. on July 15, 2010 (tentative).

24 4. As a result of the above-listed schedule, the parties agree that the close of expert
25 discovery should be continued for the purpose of completing the above-listed depositions as
26 scheduled.

27 5. The parties further agree that the deadline for the parties to file any motions to
28 compel as to expert discovery should be continued from July 5, 2010 to July 16, 2010 to

1 accommodate the new schedule.

2 Good cause exists for the Court to enter an order granting the parties' joint requests.

3 IT IS SO STIPULATED.

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5 Dated: June 25, 2010

McMANIS FAULKNER

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//s//

ELIZABETH PIPKIN

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Attorneys for Plaintiff,
SARAH KIM

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10 Dated: June 25, 2010

LEWIS BRISBOIS BISGAARD & SMITH LLP

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//s//

CHARLES O. THOMPSON
ALICE CONWAY POWERS

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Attorneys for Defendants,
INTERDENT, INC., a Delaware corporation, a/k/a
INTERDENT SERVICE CORPORATION, a
Washington corporation, a/ka GENTLE DENTAL,
a/k/a MOUNTAIN VIEW DENTAL, a/k/a BLUE
OAK DENTAL GROUP, a/k/a DEDICATED
DENTAL, a/k/a AFFORDABLE DENTAL CARE,
a/k/a CAPITAL DENTAL

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated: _____

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HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA

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