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

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

14 Plaintiff,

15 vs.

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

21 Defendants.
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Case No. CV-08-5565-SI

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE MEDIATION
 COMPLETION DATE, CASE
 MANAGEMENT CONFERENCE DATE,
 AND DISCOVERY DEADLINES**

23 Plaintiff, Sarah Kim, Individually and as Successor in Interest to Richard D. Bae, D.D.S.,
 24 Deceased (“plaintiff”), and defendants, Interdent, Inc., a Delaware corporation, a/k/a Interdent
 25 Service Corporation, a Washington corporation, a/k/a Gentle Dental, a/k/a Mountain View
 26 Dental, a/k/a Blue Oak Dental Group, a/k/a Dedicated Dental, a/k/a Affordable Dental Care, and
 27 a/k/a Capital Dental (collectively, “defendants”), by and through their respective attorneys of
 28

1 record, hereby jointly request that this Court issue an order continuing the deadline to mediate,
2 the further case management conference, and the discovery deadlines as set forth below.

3 Due to the discovery stay ordered by the Court while defendants' Motion to Dismiss the
4 First Amended Complaint was pending, the parties seek additional time to conduct and complete
5 discovery in order to prepare for trial.

6 1) The deadline to complete mediation is continued from December 20, 2009, to
7 February 16, 2010;

8 2) The further Case Management Conference is continued from Friday, January 29,
9 2010 at 3:00 p.m. to Friday, March 5, 2010 at 3:00 p.m.;

10 3) The cutoff for non-expert discovery is continued from April 12, 2010, to May 12,
11 2010;

12 4) The deadline to disclose experts is continued from April 12, 2010, to May 12,
13 2010. The parties further agree that no demand for the exchange of expert information is
14 required and that instead of written reports, pursuant to Fed. R. Civ. P. 26(a)(2)(B), the parties
15 will instead comply with the requirements of California Code of Civil Procedure section
16 2034.260 as to what information is required in the exchange of expert witness information;

17 5) The deadline to disclose rebuttal experts is continued from April 30, 2010, to May
18 31, 2010. The parties further agree that, instead of written reports pursuant to Fed. R. Civ. P.
19 26(a)(2)(B), the parties will instead comply with the requirements of California Code of Civil
20 Procedure sections 2034.260 and 2034.280 as to what information is required in any
21 supplemental expert witness list; and

22 6) The cutoff for expert discovery is continued from May 29, 2010, to June 28, 2010.

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The last day to hear dispositive motions, the pre-trial conference date and the trial date remain the same as previously ordered by the Court on June 11, 2009.

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

IT IS SO STIPULATED.

Dated: December 3, 2009

McMANIS FAULKNER

//s//
MATTHEW SCHECHTER

Attorneys for Plaintiff,
SARAH KIM

Dated: December 3, 2009

LEWIS BRISBOIS BISGAARD & SMITH LLP


//s//
CHARLES O. THOMPSON
ALICE CONWAY POWERS

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

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____



HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA