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

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

13 Plaintiff,

14 vs.

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

20 Defendants.

Case No. CV-08-5565-SI

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING THE MOTION
 TO COMPEL DEADLINE AS TO
 21 SELECTED DISCOVERY**

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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 stipulate as follows:

7 1. With limited exceptions pursuant to stipulation and order or per a specific Court
8 order, fact discovery closed in this case on Wednesday, May 12, 2010. Expert discovery closes
9 on June 28, 2010

10 2. Local Rule 37-3 states that: “Where the Court has set separate deadlines for fact
11 and expert discovery, no motions to compel fact discovery may be filed more than 7 days after
12 the fact discovery cut-off[.]”

13 3. Here, except for otherwise ordered, the deadline for filing a motion to compel as
14 to fact discovery is Wednesday, May 19, 2010.

15 4. Plaintiff, on May 14, 2010, sent meet and confer letters to defendant regarding
16 responses to form interrogatories, special interrogatories, document requests, and a document
17 only subpoena served on Michael S. Tancio, D.M.D., A Dental Corporation.

18 5. On May 17, 2010, in response to plaintiff’s meet and confer letters, defendant said
19 that it will provide supplemental responses as to the following: form interrogatories number 15.1
20 and 16.1, special interrogatories number 11 and 14, document requests number 67 and 68 as well
21 as those requests seeking email communications, and the subpoena served on Michael S. Tancio,
22 D.M.D., A Dental Corporation.

23 6. The parties agree that they would be best served if defendant provided its
24 supplemental responses for plaintiff’s review, along with the opportunity for further meet and
25 confer on the supplemental responses, before plaintiff was forced to file a motion to compel with
26 the Court.

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1 7. Defendant will produce its supplemental responses on a rolling basis, but no later
2 than May 28, 2010.

3 8. As to the responses and supplemental responses to form interrogatories number
4 15.1 and 16.1, special interrogatories number 11 and 14, document requests number 67 and 68,
5 and the third-party subpoena served on Michael S. Tancio, D.M.D., A Dental Corporation,
6 plaintiff will have one (1) week from the date of service of each supplemental response to engage
7 in further meet and confer with defendant and, if necessary, file a motion to compel with the
8 Court.

9 9. As to the document requests regarding any and all electronic mail, the deadline to
10 bring a motion to compel as to that particular discovery issue is continued to June 14, 2010.

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