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6 Attorneys for Defendants WELLS FARGO
 7 BANK, N.A. (successor by merger to
 WACHOVIA BANK, N.A.) and
 8 METROPOLITAN WEST SECURITIES LLC

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

STATE COMPENSATION INSURANCE
 FUND,

Plaintiff,

vs.

METROPOLITAN WEST SECURITIES
 LLC; WACHOVIA BANK, N.A.; DOES
 1 through 10, inclusive; and DOES 11
 through 20, inclusive,

Defendants.

CASE NO. CV 09-02959 JSW (EDL)

**STIPULATION AND ~~PROPOSED~~ ORDER
 CONTINUING CASE DEADLINES
 AS MODIFIED**

[Declaration of James C. Rutten filed
 concurrently herewith]

1 WHEREAS the Court entered a stipulated order on November 1, 2010 providing the
2 following case schedule:

3	Fact discovery cutoff:	March 18, 2011
4	Disclosure of experts and reports:	March 25, 2011
5	Disclosure of rebuttal experts and reports:	April 13, 2011
6	Expert discovery cutoff:	May 3, 2011
7	Completion of mediation:	May 31, 2010
8	Dispositive motion hearing date:	June 10, 2011
9	Final pretrial conference:	August 1, 2011
10	Trial:	August 22, 2011

11 WHEREAS the parties have been diligently engaged in discovery, including significant
12 written discovery, third-party subpoenas, and the production of both paper and electronic
13 documents (including the recent production of more than 85,000 pages of electronic documents);

14 WHEREAS the parties are continuing their document production efforts, and expect
15 substantial additional productions to take place in the near future;

16 WHEREAS the parties filed cross-motions to compel, which were heard on December 7,
17 2010 by the Magistrate Judge;

18 WHEREAS the Magistrate Judge provided guidance to the parties on the discovery issues
19 raised in the cross-motions, including as to which categories of documents should be produced,
20 which custodians' electronic files should be searched, and which electronic search terms should
21 be used to locate potentially responsive documents;

22 WHEREAS the Magistrate Judge ordered the parties to meet and confer further in an
23 effort to resolve the discovery disputes in light of the guidance provided;

24 WHEREAS the parties expect that, as a result, substantial additional document production
25 efforts will be undertaken that will be over and above the currently in-process productions;

26 WHEREAS Defendants' counsel have numerous commitments in the final months of the
27 existing discovery period that will substantially affect counsel's ability to complete discovery
28 efforts, including but not limited to (1) a trial in a patent case pending in the United States District

