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 18 FRANK A. J. GONSALVES

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

23 FRANK A. J. GONSALVES,
 Plaintiff,
 24
 25 vs.
 26 INFOSYS TECHNOLOGIES LTD.; and
 JOHN DOES I-X, inclusive,
 27 Defendants.

Case No. 3:09-cv-04112 MHP
**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER TO EXTEND DEADLINES**

1 WHEREAS, per the Court's Minutes dated September 22, 2010, the Court ordered that
2 the parties complete mediation by January 18, 2011;

3 WHEREAS, the parties are continuing to engage in limited discovery, including
4 depositions and anticipate that discovery will take place up until April 2011;

5 WHEREAS, the parties are working diligently to review and produce documents
6 (including electronic documents on computer hard drives) and to schedule depositions, including
7 depositions of very high-level company executives (such as the Chief Executive Officer and
8 Chief Operating Officer of Defendant Infosys) in India;

9 WHEREAS, the parties need additional time to complete depositions given schedule
10 conflicts of counsel and witnesses;

11 WHEREAS, the parties agree that mediation will be more productive if held after the
12 completion of document production and depositions of key witnesses;

13 WHEREAS, the parties will schedule a mediation session with mediator Jerome Weiss as
14 soon as possible following depositions;

15 WHEREAS, the parties believe that the Case Management Conference, currently
16 scheduled for March 28, 2011, would be more efficient if held after the mediation;

17 THEREFORE, the parties hereby stipulate, and request that the Court order, that the
18 parties engage in mediation by June 30, 2011 and file a status statement regarding the outcome of
19 private ADR by June 30, 2011. The parties also stipulate and request that the Court order that the
20 Case Management Conference be continued to until after June 30, 2011.

21
22 Dated: January 18, 2011

MORGAN, LEWIS & BOCKIUS LLP

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24 By _____ /s/
25 Melinda S. Riechert
26 Shweta Gera
27 Attorneys for Defendant
28 INFOSYS TECHNOLOGIES LIMITED

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Dated: January 18, 2011

THORMAN & HARDIN-LEVINE CO., L.P.A.

By _____ /s/
Christopher P. Thorman
Peter Hardin-Levine
Mark Griffin
Attorneys for Plaintiff
FRANK A. J. GONSALVES

[PROPOSED] ORDER

Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2011, is hereby continued until June 30, 2011. The parties shall file a status statement regarding the outcome of private ADR by June 30, 2011. The Case Management Conference currently set for March 28, 2011 is hereby continued to July 11, 2011. at 3:00 p.m.

IT IS SO ORDERED.

Dated: 1/19, 2011

