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14 Attorneys for Plaintiffs
 15 SANRIO COMPANY, LTD. and
 16 SANRIO, INC.

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

19 SANRIO COMPANY, LTD., et al.,

20 Plaintiffs,

21 vs.

22 RODNEY J. RIGGS, et al,

23 Defendants.
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Case No. C 10-03342 RS

**STIPULATION TO AMEND CASE
 MANAGEMENT SCHEDULING
 ORDER; [~~PROPOSED~~] ORDER
 THEREON**

1 Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and Defendants
2 Rodney J. Riggs, Candyland, Everything Pink, Cannery Row General Store, Steinbeck's Deli &
3 Espresso Bar, Candyworld, The Candy Factory, respectfully submit this stipulation requesting an
4 extension of time for discovery and other dates as follows.

5 WHEREAS, the current trial date is for August 20, 2012 and none of the changes in deadlines
6 set forth herein will impact that date;

7 WHEREAS, the undersigned parties participated in mediation on April 27, 2011;

8 WHEREAS, following mediation the parties continued good faith settlement negotiations
9 while also engaging in some discovery;

10 WHEREAS, it now appears unlikely that the action will settle without further discovery;

11 WHEREAS, Defendants have not yet been able to identify certain witnesses (namely,
12 employees of Defendants during times the events alleged took place) which Plaintiffs will need to
13 depose;

14 WHEREAS, the current deadline to complete fact discovery is September 7, 2011;

15 WHEREAS, this is the first request by the parties to extend discovery dates;

16 WHEREAS, counsel for Plaintiffs and Defendants request that discovery and dispositive motion dates
17 be extended to provide them with adequate time to conduct discovery;

18 NOW, THEREFORE, the Parties through their undersigned counsel hereby stipulate and request the
19 Court to order that the following paragraphs of the court's January 28, 2011 Case Management
20 Scheduling Order be amended as follows:

21 3. DISCOVERY

22 On or before December 9, 2011, all non-expert discovery shall be completed by the parties.

23 4. EXPERT WITNESSES

24 A. On or before January 16, 2011, plaintiff shall disclose expert testimony and reports in
25 accordance with Federal Rule of Civil Procedure 26(a)(2).

26 B. On or before February 16, 2012, defendant shall disclose expert testimony and reports
27 in accordance with Federal Rule of Civil Procedure 26(a)(2).

28 C. On or before April 6, 2012, all discovery of expert witnesses pursuant to Federal Rule

1 of Civil Procedure 26(b)(4) shall be completed.

2 5. PRETRIAL MOTIONS

3 All pretrial motions must be filed and served pursuant to Civil Local Rule 7. All pretrial
4 motions shall be heard no later than July 10, 2012.

5 The remaining provisions of the court's January 28, 2011 Case Management Scheduling Order
6 shall remain in effect.

7
8 Dated: 8/29/11

CESARI WERNER & MORIARTY

9 By Stephen L. Dahm
10 Dennis F. Moriarty
11 Stephen L. Dahm
12 Kristina L. Velarde
13 Attorneys for Defendants RODNEY J.
14 RIGGS, Individually and dba CANDYLAND,
15 EVERYTHING PINK, CANNERY ROW
16 GENERAL STORE, STEINBECK'S DELI &
17 ESPRESSO BAR, CANDYWORLD and THE
18 CANDY FACTORY

16 Dated: 8/29/11

OWEN, WICKERSHAM & ERICKSON, P.C.

17
18 By Noel M. Cook
19 Linda Joy Kattwinkel
20 Attorneys for Plaintiffs
21 SANRIO COMPANY, LTD. and
22 SANRIO, INC.

23 IT IS SO ORDERED.

24 Dated: 9/1/11

25 Richard Seeborg
26 RICHARD SEEBORG
27 UNITED STATES DISTRICT JUDGE
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