

E-Filed 1/20/12

1 JEFFREY T. MAKOFF (SBN 120004)
jmakoff@vallemakoff.com
 2 HEATHER A. LANDIS (SBN 267615)
hlandis@vallemakoff.com
 3 MARIO R. NICHOLAS (SBN 273122)
mnicholas@vallemakoff.com
 4 VALLE MAKOFF LLP
 2 Embarcadero Center, Suite 2370
 5 San Francisco, California 94111
 Telephone: (415) 986-8001
 6 Facsimile: (415) 986-8003

7 Attorneys for Plaintiff JOE QUIRK

8 CALDWELL LESLIE & PROCTOR, PC
 CHRISTOPHER G. CALDWELL (SBN 106790)
caldwell@caldwell-leslie.com
 9 ANDREW ESBENSHADE (SBN 202301)
esbenshade@caldwell-leslie.com
 10 ALBERT GIANG (SBN 224332)
giang@caldwell-leslie.com
 11 1000 Wilshire Boulevard, Suite 600
 12 Los Angeles, California 90017-2463
 Telephone: (213) 629-9040
 13 Facsimile: (213) 629-9022

14 Attorneys for Defendants
 SONY PICTURES ENTERTAINMENT
 15 INC; COLUMBIA PICTURES
 INDUSTRIES, INC.; PARIAH;
 16 DAVID KOEPP; JOHN KAMPS

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

20 JOE QUIRK, an individual,
 21 Plaintiff,
 22 v.

23 SONY PICTURES
 ENTERTAINMENT INC., a Delaware
 24 corporation; COLUMBIA PICTURES
 INDUSTRIES, INC., a Delaware
 25 corporation; PARIAH, a California
 corporation; DAVID KOEPP, an
 26 individual; and JOHN KAMPS, an
 27 individual,
 Defendants.

Case No. CV 11-03773 RS

JOINT STIPULATION AND
~~**PROPOSED**~~ **ORDER RE**
PROPOSED SCHEDULE FOR
DISCOVERY AND OTHER PRE-
TRIAL DATES

Trial Date: March 25, 2013

SAC Filed: November 28, 2011

1 Pursuant to the Court's instructions during the initial case management
2 conference on January 12, 2012 and the Court's Civil Minute Order dated January
3 12, 2012, Plaintiff and Defendants, by and through their undersigned counsel,
4 hereby stipulate and agree to the following proposed schedule of discovery and
5 other pre-trial dates based off the currently scheduled trial date of March 25, 2013:

- 6 • FACTUAL DISCOVERY CUT-OFF: September 7, 2012
- 7 • FACTUAL DISCOVERY MOTION FILING DEADLINE: September
8 14, 2012
- 9 • EXPERT DISCLOSURES AND FINAL REPORTS: October 12, 2012
- 10 • REBUTTAL EXPERT DISCLOSURES AND FINAL REPORTS:
11 November 21, 2012
- 12 • EXPERT DISCOVERY CUT-OFF: December 21, 2012
- 13 • EXPERT DISCOVERY MOTION FILING DEADLINE: December
14 28, 2012
- 15 • DISPOSITIVE MOTION HEARING CUT-OFF: January 24, 2013
- 16 • PRE-TRIAL CONFERENCE MEETING AND DISCLOSURES:
17 February 14, 2013
- 18 • JOINT PRE-TRIAL STATEMENT AND ORDER: February 25, 2013
- 19 • EXHIBIT EXCHANGE: February 25, 2013
- 20 • MOTIONS *IN LIMINE* DEADLINE: February 25, 2013
- 21 • OPPOSITIONS TO MOTIONS *IN LIMINE* DEADLINE: March 4,
22 2013
- 23 • FINAL PRE-TRIAL CONFERENCE: 10:00 a.m. on Thursday, March
24 7, 2013

- 1 • PRE-TRIAL FILINGS (e.g., excerpts of deposition testimony or other
2 discovery to be offered at trial, jury voir dire questions, proposed jury
3 instructions, proposed jury verdict forms, trial briefs): March 18, 2013
- 4 • TRIAL DATE: March 25, 2013

5
6 **IT IS HEREBY STIPULATED AND AGREED.**

7
8 DATED: January 19, 2012 VALLE MAKOFF LLP
9 JEFFREY T. MAKOFF
10 HEATHER A. LANDIS

11 By /s/ per email authorization
12 HEATHER A. LANDIS

13 Attorneys for Plaintiff
14 JOE QUIRK

15 DATED: January 19, 2012 CALDWELL LESLIE & PROCTOR, PC
16 CHRISTOPHER G. CALDWELL
17 ANDREW ESBENSHADE
18 ALBERT GIANG

19 By /s/
20 CHRISTOPHER G. CALDWELL

21 Attorneys for Defendants
22 SONY PICTURES ENTERTAINMENT INC;
23 COLUMBIA PICTURES INDUSTRIES, INC.;;
24 PARIAH; DAVID KOEPP; JOHN KAMPS

25
26 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

27 Dated: 1/20, 2012

28 
HONORABLE RICHARD SEEBORG
District Court Judge