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10 Attorneys for Defendant
 11 CREATIVE NAIL DESIGN, INC.

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

16 MYCONE DENTAL SUPPLY CO., INC.,
 17 D/B/A/ KEYSTONE RESEARCH &
 18 PHARMACEUTICAL,

Plaintiff,

19 vs.

20 CREATIVE NAIL DESIGN, INC.,

21 Defendant.

Case No. 3:12-cv-00747-RS

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER EXTENDING
 DISCOVERY DEADLINES AND THE
 DEADLINES TO EXCHANGE EXPERT
 REPORTS**

22 AND RELATED COUNTERCLAIM
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24
 25 Pursuant to Local Rule 6-1, Defendant/Counterclaim Plaintiff Creative Nail Design, Inc.
 26 (“CND”), Plaintiff Mycone Dental Supply Co., Inc. (“Keystone”), and Counterclaim Defendants
 27 Young Nails, Inc., Cacee, Inc. and Nail Systems International (“Counterclaim Defendants”), by
 28 and through their respective counsel, hereby stipulate and agree, subject to the Court’s approval,

1 to extend the deadlines for the close of fact and expert discovery and to extend the deadlines for
2 the parties to exchange their expert reports as follows:

- 3 • The deadline for the parties to exchange opening expert reports is extended from
4 July 2, 2013 to August 30, 2013.
- 5 • The deadline for the parties to exchange rebuttal expert reports is extended from
6 July 31, 2013 to October 2, 2013.
- 7 • The deadline for Keystone to submit its reply expert report for the purpose of
8 rebutting CND's arguments on secondary considerations of nonobviousness is
9 extended from August 30, 2013 to November 1, 2013.
- 10 • The deadline for the completion of all non-expert discovery is extended from
11 September 13, 2013 to November 15, 2013.
- 12 • The deadline for the completion of discovery of expert witnesses is extended from
13 November 1, 2013 to January 10, 2014.

14 In addition, the parties have agreed that CND may take fact discovery beyond the agreed-
15 upon deadline set forth above, but only on any new issues of fact raised in Keystone's reply
16 expert report.

17 The parties request the extensions for the reasons explained in the Declaration of
18 Christopher T. La Testa, submitted herewith. This extension will not affect any other deadlines
19 set by the Court. In addition, this extension will not affect any pre-trial or trial dates as no dates
20 have been set for trial.

21 Dated: June 10, 2013

Respectfully submitted,

FREITAS TSENG & KAUFMAN LLP

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~~PROPOSED~~ ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS HEREBY ORDERED THAT the deadlines for the close of fact and expert discovery and the deadlines for the parties to exchange their expert reports are extended and set as follows:

- The deadline for the parties to exchange opening expert reports: August 30, 2013.
- The deadline for the parties to exchange rebuttal expert reports: October 2, 2013.
- The deadline for Keystone to serve reply expert report: November 1, 2013.
- The deadline for the completion of all non-expert discovery: November 15, 2013.
- The deadline for the completion of discovery of expert witnesses: January 10, 2014.

IT IS SO ORDERED.

Dated: June 10, 2013



Hon. Richard Seeborg
United States District Judge