

1 John M. Farrell (Cal. Bar No. 99649)  
[farrell@fr.com](mailto:farrell@fr.com)

2 FISH & RICHARDSON P.C.  
3 500 Arguello Street, Suite 500  
4 Redwood City, CA 94063  
5 Telephone: (650) 839-5070  
6 Facsimile: (650) 839-5071

7 Jonathan E. Singer (Cal. Bar No. 187908)  
[singer@fr.com](mailto:singer@fr.com)

8 FISH & RICHARDSON P.C.  
9 12390 El Camino Real  
10 San Diego, CA 92130  
11 Telephone: (858) 678-5070  
12 Facsimile: (858) 678-5099

13 Attorneys for Plaintiff  
14 and Third-Party Defendants

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 MYCONE DENTAL SUPPLY CO., INC.,  
19 D/B/A KEYSTONE RESEARCH &  
20 PHARMACEUTICAL,  
21 a New York Corporation,

22 Plaintiff,

23 v.

24 CREATIVE NAIL DESIGN, INC.,  
25 a California Corporation,

26 Defendant.

27 YOUNG NAILS, INC., CACEE, INC. AND  
28 NAIL SYSTEMS INTERNATIONAL,

Third-Party Defendants.

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

**JOINT STIPULATION TO EXTEND  
NEAR-TERM DEADLINES AND  
~~PROPOSED~~ ORDER**

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Mycone Dental Supply Co., Inc., d/b/a Keystone Research and Pharmaceutical, Third-Party Defendants Young Nails, Inc., Cacee, Inc., and Nail Systems International, and Defendant Creative Nail Design, Inc. submit this joint stipulation to postpone all near-term deadlines for two weeks. The parties are jointly making this

1 request because they continue to engage in settlement discussions, and believe a modest delay in  
2 near-term deadlines will facilitate these discussions. Accordingly, the parties stipulate and jointly  
3 move to postpone the following deadlines:

- 4 • The deadline for Keystone to serve its rebuttal report on objective considerations  
5 shall be extended from March 28, 2014 to April 11, 2014.
- 6 • Third-Party Defendants' deadline to comply with Judge Ryu's January 28, 2014  
7 Order, (Doc. No. 188), and produce a list of all customers to whom they sold  
8 accused products between 2011 and 2013 shall be extended from April 3, 2014 to  
9 April 17, 2014.
- 10 • The close of expert discovery shall be extended from April 16, 2014 to April 30,  
11 2014.

12 This extension will not affect any other deadlines set by the Court. In addition, this  
13 extension will not affect any pre-trial or trial dates as no dates have been set for trial.

14 In accordance with General Order No. 45, Section X(B), the filer of this document hereby  
15 attests that the concurrence to the filing of this document has been obtained from the other  
16 signatory hereto.

17 Dated: March 24, 2014

18 Respectfully submitted,

19 /s/ John R. Lane

20 John R. Lane (pro hac vice)

21 [JLane@fr.com](mailto:JLane@fr.com)

22 FISH & RICHARDSON P.C.

23 1221 McKinney Street, Suite 2800

24 Houston, TX 77010

25 Telephone: (713) 654-5300

26 Facsimile: (713) 652-0109

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John M. Farrell (Cal. Bar No. 99649)  
[farrell@fr.com](mailto:farrell@fr.com)  
FISH & RICHARDSON, PC  
500 Arguello Street, Suite 500  
Redwood City, CA 94063  
Telephone: (650) 839-5070  
Facsimile : (650) 839-5071

Jonathan E. Singer (Cal. Bar No. 187908)  
[singer@fr.com](mailto:singer@fr.com)  
12390 El Camino Real  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099

Joseph A. Herriges (pro hac vice)  
[herriges@fr.com](mailto:herriges@fr.com)  
FISH & RICHARDSON P.C.  
60 South 6th Street, Suite 3200  
Minneapolis, MN 55402  
Telephone: (612) 335-5070  
Facsimile : (612) 288-9696

Ira A. Rosenau (pro hac vice)  
[irosenau@klehr.com](mailto:irosenau@klehr.com)  
KLEHR HARRISON HARVEY  
BRANZBURG, LLP  
1835 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 568-6060  
Facsimile: (215) 568-6603

Attorneys for Plaintiff and Third-Party Defendants

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/s/ Colette R. Verkuil  
Colette R. Verkuil (CA SBN 263630)  
[CVerkuil@mofo.com](mailto:CVerkuil@mofo.com)  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, CA 94304-1018  
Telephone: 650-813-5600  
Facsimile: 650-494-0792

Adam R. Hess (pro hac vice)  
[arhess@venable.com](mailto:arhess@venable.com)  
Christopher T. La Testa (pro hac vice)  
ctlatesta@venable.com  
VENABLE LLP  
575 7<sup>th</sup> Street N.W.  
Washington, D.C. 20004  
Telephone: (202) 344-4547  
Facsimile: (202) 344-8300

Craig Kaufman (Cal. Bar. No. 159458)  
[ckaufman@ftklaw.com](mailto:ckaufman@ftklaw.com)  
FREITAS TSENG & KAUFMAN LLP  
100 Marine Parkway  
Suite 200  
Redwood Shores, CA 94065  
Telephone: (650) 730-5557

Attorneys for Defendant


1 **[PROPOSED] ORDER**

2  
3 PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED THAT:

- 4
- The deadline for Keystone to serve its rebuttal report on objective considerations shall be extended from March 28, 2014 to April 11, 2014.
  - Third-Party Defendants' deadline to comply with Judge Ryu's January 28, 2014 Order, (Doc. No. 188), and produce a list of all customers to whom they sold accused products between 2011 and 2013 shall be extended from April 3, 2014 to April 17, 2014.
  - The close of expert discovery shall be extended from April 16, 2014 to April 30, 2014.
- 13

14 **IT IS SO ORDERED.**

15 Dated: 3/25, 2014

16  
17   
18 Hon. Richard Seeborg  
United States District Judge