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12	Attorneys for Defendants Zimmer, Inc., Zimmer			
	Holdings, Inc., and Zimmer Orthopedic Surgical Products, Inc.			
14	UNITED STATES DISTRICT COURT			
15	NORTHERN DISTRICT OF CALIFORNIA			
16	JOHN MOFFETT,	Case Number: 3:12-cv-3445-WHO		
1 – 1				
17	Plaintiff	JOINT STIPULATION TO EXTEND		
17 18	Plaintiff,	JOINT STIPULATION TO EXTEND DEADLINES		
	V. ()	DEADLINES		
18 19				
18 19 20	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.;	DEADLINES		
18 19 20 21	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON	DEADLINES		
18 19 20 21 22	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL	DEADLINES		
 18 19 20 21 22 23 	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through	DEADLINES		
18 19 20 21 22	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through ONE HUNDRED, inclusive,	DEADLINES		
 18 19 20 21 22 23 	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through ONE HUNDRED, inclusive, Defendants.	DEADLINES		
 18 19 20 21 22 23 24 	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through ONE HUNDRED, inclusive, Defendants.	DEADLINES Honorable William H. Orrick		
 18 19 20 21 22 23 24 25 	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through ONE HUNDRED, inclusive, Defendants.	DEADLINES Honorable William H. Orrick htiff John Moffett and Defendants Zimmer, Inc., Surgical Products, Inc. (collectively, the "Parties")		
 18 19 20 21 22 23 24 25 26 	v. ZIMMER, INC; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC., A/K/A ZIMMER WILSON PHILLIPS; ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.; McKESSON CORPORATION; and DOES ONE through ONE HUNDRED, inclusive, Defendants. Pursuant to Local Rule 6-2 and 7-12, Plain Zimmer Holdings, Inc., and Zimmer Orthopedic S	DEADLINES Honorable William H. Orrick htiff John Moffett and Defendants Zimmer, Inc., Surgical Products, Inc. (collectively, the "Parties") el of record, to an extension of the discovery		

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1 1. The Court entered the Civil Pretrial Order (the "Order") on December 23, 2014, 2 which sets forth the current case schedule in this matter (Doc. 28). The Court also set a mediation 3 deadline of November 15, 2015, in civil minutes entered on December 16, 2015 (Doc. 27). The 4 Parties respectfully seek a brief extension of the discovery and mediation deadlines in this case. The 5 Parties do not seek to alter the deadline for dispositive motions or the pretrial conference date.

6 This is the Parties' first stipulation or request to extend the deadlines and is made in 2. 7 order to allow the Parties additional time to conduct and exchange discovery, collect all relevant 8 medical records, and issue expert reports necessary to collectively evaluate their cases. Furthermore, 9 mediation has a greater possibility of being productive once additional fact discovery has been completed in this case and the parties have begun to develop their arguments and defenses.

3. This request is made for good cause and not made for the purposes of delay or to prejudice any party, but in the interests of justice and for the purposes of an efficient and costeffective potential resolution of this case.

14 NOW THEREFORE, the Parties, through their counsel of record, hereby STIPULATE and 15 AGREE that the deadlines in the Order are amended as follows: 16

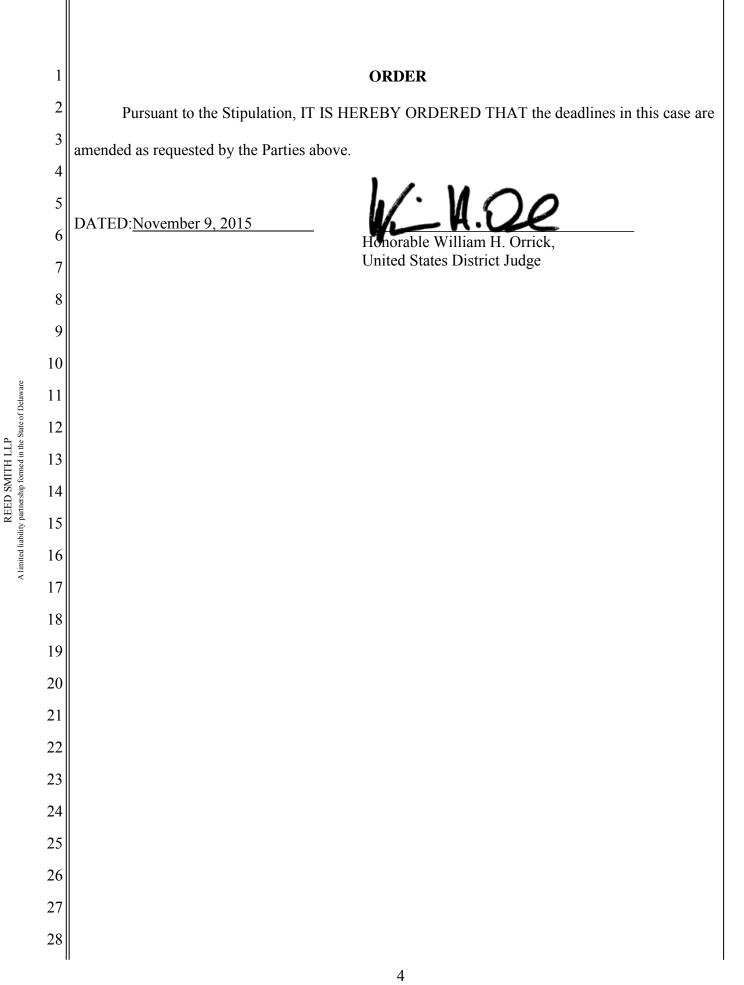
Event/Deadline	Current Date	New Date After Extension
Discovery Cutoff	March 1, 2016	May 2, 2016
Plaintiff's Expert Disclosure	November 9, 2015	January 8, 2016
Defendants' Expert Disclosure	November 9, 2015	February 23, 2016
Expert Rebuttal	January 29, 2015	April 1, 2016
Mediation Deadline	November 15, 2015	January 15, 2016
DATED: November 3, 2015	THE MULLIGAN LAW FI	RM
<i>/s/ Eric W. Gruenwald</i> Eric W. Gruenwald		
3710 Rawlins St., Suite 901 Dallas, TX 75219-4231		
Telephone: 916.922.2310		

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JOINT STIPULATION TO EXTEND DEADLINES

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13	Attorneys for Defendants Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Orthopedic Surgical	
14	Products, Inc.	
15	The undersigned attests that concurrence in the filing of the document has been obtained	
16	from each of the signatories.	
17	REED SMITH LLP	
18		
19	<u>/s/ Candace B. Neal</u> Candace B. Neal (SBN 288587)	
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JOINT STIPULATION TO EXTEND DEADLINES