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Attorneys for Defendant  
 Foray Technologies, LLC

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

KWAN SOFTWARE ENGINEERING, INC, )  
 a California Corporation, dba VERIPIC, INC., )

Case No.: CV-12-03762 SI

Plaintiff,

STIPULATION AND ~~PROPOSED~~ ORDER  
 REGARDING EXPERT WITNESS  
 DISCLOSURE

vs.

FORAY TECHNOLOGIES, LLC, a Delaware )  
 Limited Liability Company, )

CORRECTED VERSION W/JUDGE'S ADDITIONAL  
 ORDER

Defendant.

Plaintiff Kwan Software Engineering, Inc, dba Veripic Inc., (“Veripic”) and defendant  
 Foray Technologies, LLC (“Foray”) stipulate and agree as follows:

WHEREAS, the parties have met and conferred on scheduled case deadlines with respect  
 to the exchange of expert witness reports;

WHEREAS, the parties have both retained expert witnesses that require additional time  
 to examine evidence provided in this case and prepare their reports;

WHEREAS, the parties agree that a short continuance of the expert witness report  
 exchange deadline would give their respective experts sufficient time to prepare meaningful

1 reports that would aid the finder of fact and would promote a fair trial on these issues on the  
2 merits;

3 WHEREAS, the parties agree that a continuance of the expert witness exchange deadline  
4 would necessitate a corresponding continuance of the dispositive motion filing deadlines so that  
5 the parties would have sufficient time to take expert witness discovery and, if necessary, retain  
6 and prepare rebuttal expert testimony; and

7 THEREFORE, the parties stipulate and agree, and respectfully request that this Court  
8 Order, that the deadline to designate expert witnesses shall be continued to October 18, 2013;

9 The parties further stipulate and agree that Rebuttal experts shall be disclosed and expert  
10 discovery completed by November 22, 2013;

11 The parties further stipulate and agree that the last day to file dispositive motions shall be  
12 continued to November 29, 2013;

13 The parties further stipulate and agree that any Opposition briefs shall be filed and served  
14 by December 16, 2013;

15 The parties further stipulate and agree that any Reply shall be filed and served by  
16 December 23, 2013;

17 The parties further stipulate and agree that the last day to hear dispositive motions shall  
18 be continued to January <sup>17</sup>~~16~~, 2014, or such later date as set by this Court.

19 Dated: September 13, 2013

20 GREENAN, PEFFER, SALLANDER & LALLY LLP

21  
22 Bv:                     /S/                      
23 Chip Cox  
24 Attorneys for Defendant Foray Technologies, LLC

25 IT IS ORDERED that the pretrial filing deadline is 1/28/14. The Pretrial  
26 /// Conference is continued to 2/4/14, at 3:30 p.m. The Jury trial is continued to  
27 /// 2/18/14, at 8:30 a.m.

28 ///

1 Dated: September 13, 2013

2 GRELLAS SHAH LLP

3  
4 Bv: /S/ Dhaivat Shah  
5 Dhaivat Shah  
6 David Siegel  
7 Attorneys for Plaintiff Kwan Software Engineering,  
8 Inc.. dba Veripic. Inc.  
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10 IT IS SO ORDERED

11 Dated: September 16, 2013

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15 SUSAN ILLSTON  
16 United States District Judge  
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