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7 Attorneys for Plaintiff  
 KWAN SOFTWARE ENGINEERING, INC.,  
 8 a California corporation, dba VERIPIC, INC.

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

GRELLAS SHAH LLP  
 20400 STEVENS CREEK BLVD, SUITE 280  
 CUPERTINO, CA 95014

13 KWAN SOFTWARE ENGINEERING,  
 14 INC., a California corporation, dba  
 VERIPIC, INC.,

15 Plaintiff,

16 v.

17 FORAY TECHNOLOGIES, LLC, a  
 18 Delaware Limited Liability Company,

19 Defendant.

**Case No.: CV-12-03762 SI**

STIPULATION AND ~~[PROPOSED]~~ ORDER  
 REGARDING CASE SCHEDULING

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

3 WHEREAS, on November 14, 2013, the Court issued an Order delaying the trial date  
4 in this matter until March 10, 2014;

5 WHEREAS, the parties have agreed that additional time is needed for depositions and  
6 expert discovery, which necessitates a revision of the current pre-trial discovery and  
7 dispositive motion schedule;

8 THEREFORE, the parties respectfully request that the Court issue an Order as follows:

9 1) The new deposition, expert discovery and dispositive motion schedule is as  
10 follows:

11	Last day to file dispositive motions:	December 27
12	Expert discovery cut-off/Rebuttal reports	January 10
13	Last day for lay witness depositions	January 10
14	Last day to file Oppositions:	January 10
15	Last day to file Reply:	January 17
16	Last day for hearing	<del>January 31</del> February 7, 2014

Pretrial Conference continued to: 3/4/14 @ 3:30 p.m.

17 2) Other than for depositions, the non-expert fact discovery cut-off is not extended by  
18 this Order; and

19 3) Each party is entitled to take five (5) additional depositions, beyond the ten (10)  
20 depositions authorized under Rule 30 of the Federal Rules of Civil Procedure.

21 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

22 DATED: December 4, 2013

/s/ David I. Siegel  
David I. Siegel, GRELLAS SHAH LLP,  
Attorneys for Plaintiff

23 DATED: December 4, 2013

/s/ Chip B. Cox  
Chip B. Cox, GREENAN, PEPPER, SALLANDER  
& LALLY LLP, Attorneys for Defendant

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CERTIFICATION OF CONCURRENCE

I, David I. Siegel, attest that Chip Cox has concurred in the filing of this document.

/s/ David I. Siegel  
David I. Siegel

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 12/5/13

  
Hon. Susan Illston  
United States District Judge