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Attorneys for Defendant SPECIALIZED BICYCLE COMPONENTS, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ICON-IP PTY, LTD.,) Case No. CV-12-3844 JST
Plaintiff,)
v.)
SPECIALIZED BICYCLE) STIPULATION AND PROPOSED
COMPONENTS, INC.,) ORDER TO CONTINUE PRETRIAL
Defendant.) DEADLINES PURSUANT TO CIVIL
) L.R. 6-2
)
) Hon. Jon S. Tigar
)
)

Pursuant to Civil Local Rule 6-2 and pursuant to this Court’s November 5, 2014 Order (Dkt. No. 132), Plaintiff Icon-IP Pty Ltd. (“Icon”) and Defendant Specialized Bicycle Components, Inc. (“Specialized”), by and through their respective counsel of record hereby stipulate and request that the Court enter an Order extending certain pretrial deadlines as set forth below. In support of this request, the parties state as follows:

WHEREAS, the parties have agreed to modify the discovery deadlines as follows:

Event	Current Dates	Proposed Dates
Close of Fact Discovery	October 24, 2014	November 26, 2014
Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden	November 21, 2014	December 5, 2014
Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports	December 19, 2014	January 7, 2015
Close of Expert Discovery	January 19, 2015	January 21, 2015
Deadline to File Dispositive Motions	January 23, 2015	Unchanged
Pretrial Conference Statement	April 21, 2015	Unchanged
Pretrial Conference	May 1, 2015	Unchanged
Trial	May 26, 2015 at 8:30 a.m.	Unchanged

WHEREAS, the parties agree as follows:

Specialized will make Nick Gosseen and Tom Larter available for deposition pursuant to Fed. R. Civ. P. 30(b)(1);

Subject to its objections and responses, Specialized will designate Nick Gosseen, Tom Larter, and Efren Gonzalez on the following deposition topics listed in Icon’s Amended Notice of Deposition of Specialized Pursuant to Fed. R. Civ. P. 30(b)(6): Topic Nos. 1-6, 9-22, 23 (as modified per agreement), 24-34, 36-40, 45-46, 51-56, 68, 69, 70, 71, 74, 78, 79, and 81.

Subject to its objections and responses, Specialized will produce Ms. Kim Arca for deposition on topics 41 and 42;

1 The parties agree that Specialized will not produce a witness on any of the remaining
2 30(b)(6) topics.

3 NOW THEREFORE, in consideration of the foregoing, the parties by and through their
4 undersigned counsel, hereby stipulate and request that the Court enter an Order continuing certain
5 deadlines as identified above.

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8 **IT IS SO STIPULATED.**

9 Dated:

By: /s/ Ashley E. LaValley
Raymond P. Niro
Frederick C. Laney
Ashley E. Lavalley
NIRO, HALLER & NIRO
Attorneys for ICON-IP PTY, LTD.

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14 Dated:

By: /s/ Darrell L. Olson
Darrell L. Olson
Benjamin J. Everton
KNOBBE, MARTENS, OLSON & BEAR, LLP
Attorneys for SPECIALIZED BICYCLE
COMPONENTS, INC.

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~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, the Court continues the fact and expert discovery deadlines as follows:

Dates	Event
November 26, 2014	Close of Fact Discovery
December 5, 2014	Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden
January 7, 2015	Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports
January 21, 2015	Close of Expert Discovery

PURSUANT TO STIPULATION, IT IS SO ORDERED.



Dated: 11/7/2014

By: _____
The Honorable Jon S. Tigar
UNITED STATES DISTRICT JUDGE

FILER’S ATTESTATION

Pursuant to Civil Local Rule 5-1(i) regarding signatures, I, Ashley E. LaValley, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated:

By: /s/ Ashley E. LaValley
Ashley E. LaValley
NIRO, HALLER & NIRO
Attorneys for Icon-IP Pty Ltd.

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