

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MARTIN L. FINEMAN (Bar No. 104413)
DAVIS WRIGHT TREMAINE LLP
One Embarcadero Center, Suite 600
San Francisco, California 94111-3611
Telephone: (415) 276-6500
Facsimile: (415) 276-6599
Email: martinfineman@dwt.com

RAYMOND P. NIRO
FREDERICK C. LANEY (admitted pro hac vice)
ASHLEY E. LaVALLEY (admitted pro hac vice)
NIRO, HALLER & NIRO
181 W. Madison, Suite 4600
Chicago, Illinois 60602
Phone: (312) 236-0733
Fax: (312) 236-3137
E-mail: rniro@nshn.com
E-mail: laney@nshn.com
E-mail: alavalley@nshn.com

Attorneys for Plaintiff ICON-IP PTY LTD.

DARRELL L. OLSON (Bar No. 77633)
darrell.olson@knobbe.com
EDWARD A. SCHLATTER (Bar No. 120177)
edward.schlatter@knobbe.com
BENJAMIN EVERTON
ben.everton@knobbe.com
Knobbe, Martens, Olson & Bear, LLP
2040 Main Street, Suite 1400
Irvine, CA 92614
Telephone: (949) 760-0404
Facsimile: (949) 760-9502

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.,)
)
Plaintiff,)
)
v.)
)
SPECIALIZED BICYCLE)
COMPONENTS, INC.,)
)
)
Defendant.)

12-cv-03844-JST

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE PRETRIAL
DEADLINES PURSUANT TO CIVIL
L.R. 6-2**

1 Pursuant to Civil Local Rule 6-2, Plaintiff Icon-IP Pty Ltd. (“Icon”) and Defendant
2 Specialized Bicycle Components, Inc. (“Specialized”), by and through their respective counsel of
3 record, hereby stipulate and request that the Court enter an Order extending certain pretrial deadlines
4 by thirty (30) days as set forth below. In support of this request, the parties state as follows:

5 WHEREAS, on April 19, 2013, the Court issued an Order setting the pretrial deadlines (Dkt.
6 No. 26);

7 WHEREAS, counsel for Icon will be at trial beginning May 6, 2014 in the Central District of
8 California, which is expected to last two weeks;

9 WHEREAS, in light of trial, Icon believes it requires additional time to complete fact
10 discovery prior to the currently schedule deadline;

11 WHEREAS, Defendant has agreed to a thirty-day extension of certain currently scheduled
12 deadlines as set forth below.

13 WHEREAS, the parties have previously stipulated to extend the deadline for the parties to
14 hold an ADR session from January 30, 2013 to March 27, 2013 and again stipulated to extend the
15 deadline for the parties to hold an ADR session from March 27, 2013 to April 30, 2013;

16 WHEREAS, this requested extension will not affect any deadlines for any matter required to
17 be filed or lodged with Court, including the deadlines for the parties to file dispositive motions.

18 WHEREAS, this stipulation is not entered into for the purpose of delay;

19 NOW THEREFORE, in consideration of the foregoing, the parties by and through their
20 undersigned counsel, hereby stipulate and request that the Court enter an Order continuing certain
21 deadlines as follows:
22
23
24

Event	Current Dates	Proposed Dates
Advice of Counsel disclosures due (Patent L.R. 3-7)	June 5, 2014	July 7, 2014
Close of Fact Discovery	August 15, 2014	September 19, 2014
Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden	September 19, 2014	October 17, 2014

1	Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports	October 17, 2014	November 14, 2014
2	Close of Expert Discovery	November 14, 2014	December 19, 2014
3	Deadline to File Dispositive Motions and any motion to limit or exclude Expert Testimony	January 23, 2015	January 23, 2015
4	Pretrial Conference	At the Court's Convenience	At the Court's Convenience
5	Trial	At the Court's Convenience	At the Court's Convenience

7
8
9
10 **IT IS SO STIPULATED.**

11 Dated: May 5, 2014

By: /s/ Ashley E. LaValley

12 Raymond P. Niro
13 Frederick C. Laney
14 Ashley E. Lavalley
15 NIRO, HALLER & NIRO
16 Attorneys for ICON-IP PTY, LTD.

17 Dated: May 5, 2014

By: /s/ Darrell L. Olson

18 Darrell L. Olson
19 Edward A. Schlatter
20 Benjamin J. Everton
21 KNOBBE, MARTENS, OLSON & BEAR, LLP
22 Attorneys for SPECIALIZED BICYCLE
23 COMPONENTS, INC.
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

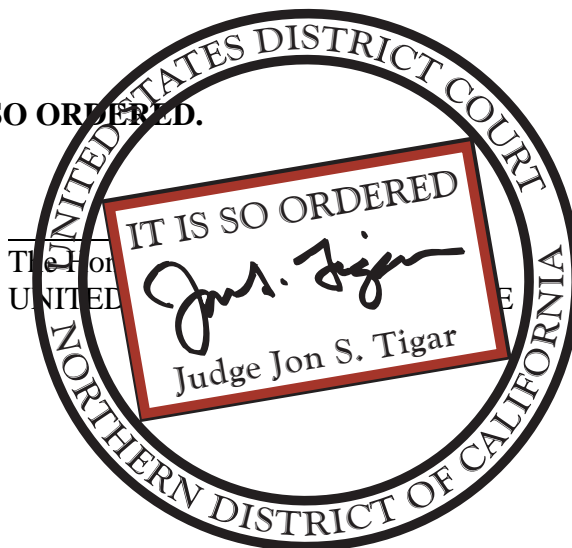
Pursuant to the parties' stipulation, the Court continues the fact and expert discovery deadlines by thirty (30) days as follows:

Dates	Event
July 7, 2014	Advice of Counsel disclosures due (Patent L.R. 3-7)
September 19, 2014	Close of Fact Discovery
October 17, 2014	Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden
November 14, 2014	Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports
December 19, 2014	Close of Expert Discovery
January 23, 2015	Deadline to File Dispositive Motions and any motion to limit or exclude Expert Testimony
At the Court's Convenience	Pretrial Conference
At the Court's Convenience	Trial

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 6, 2014

By:



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: May 5, 2014

By: /s/ Ashley E. LaValley
Ashley E. LaValley
NIRO, HALLER, & NIRO
Attorney for Plaintiff, ICON-IP PTY LTD.