

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, the parties are actively pursuing fact discovery and are still working to resolve
8 issues related to discovery requests and the scheduling of depositions;

9 WHEREAS, the parties believe the proposed extension of the deadlines will allow the parties
10 to complete discovery;

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

14 WHEREAS, the parties have previously stipulated to extend pretrial deadlines (Dkt. No. 75);

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

17 WHEREAS, the parties do not believe the extension sought hereby will prejudice either party
18 or result in undue delay;

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

Event	Current Dates	Proposed Dates
Close of Fact Discovery	September 19, 2014	October 24, 2014
Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden	October 17, 2014	November 21, 2014
Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports	November 14, 2014	December 19, 2014

1	Close of Expert Discovery	December 19, 2014	January 19, 2015
2	Deadline to File Dispositive Motions	January 23, 2015	January 23, 2015
3	Pretrial Conference	At Court's Convenience	At Court's Convenience
4	Trial	At Court's Convenience	At Court's Convenience

5
6 **IT IS SO STIPULATED.**

7
8 Dated: August 20, 2014

By: /s/Ashley E. Lavalley (with permission)

9 Raymond P. Niro
10 Frederick C. Laney
11 Ashley E. Lavalley
12 NIRO, HALLER & NIRO
13 Attorneys for ICON-IP PTY, LTD.

14 Dated: August 20, 2014

By: /s/Benjamin J. Everton

15 Darrell L. Olson
16 Benjamin J. Everton
17 KNOBBE, MARTENS, OLSON & BEAR, LLP
18 Attorneys for SPECIALIZED BICYCLE
19 COMPONENTS, INC.
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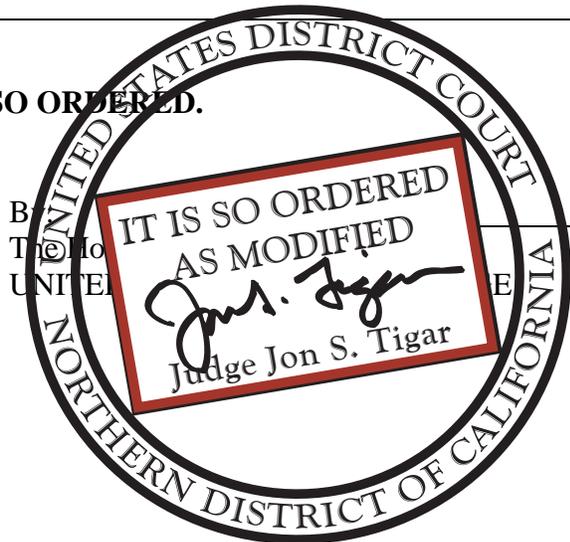
1 **[PROPOSED] ORDER**

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

Dates	Event
October 24, 2014	Close of Fact Discovery
November 21, 2014	Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden
December 19, 2014	Designation of Rebuttal Experts and Exchange of Rebuttal Expert Reports
January 19, 2015	Close of Expert Discovery
January 23, 2015	Deadline to File Dispositive Motions
April 21, 2015	Pretrial Conference Statement
May 1, 2015 at 2:00 p.m.	Pretrial Conference
May 26, 2015 at 8:30 a.m.	Jury Trial

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

13 Dated: August 21, 2014



FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i) regarding signatures, I, Benjamin J. Everton, 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: August 20, 2014

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

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