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Attorneys for Defendant

E.I. de Pont de Nemours and Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EASTON-BELL SPORTS, INC. a Delaware corporation,

Plaintiff,

v.

E. I. DU PONT DE NEMOURS AND COMPANY, a Delaware corporation, aka DUPONT, and DOES 1 through 10,

Case No.: 3:13-cv-00283-NC

STIPULATED REQUEST TO CONTINUE THE DEADLINE FOR COMPLETING ADR AND TO AMEND SCHEDULING ORDER WITH ~~PROPOSED~~ ORDER

Magistrate Judge Nathanael M. Cousins

STIPULATED REQUEST TO CONTINUE DEADLINE FOR COMPLETING ADR AND TO AMEND SCHEDULING ORDER WITH ~~PROPOSED~~ ORDER

Defendants.

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E.I. DU PONT DE NEMOURS AND
COMPANY, a Delaware corporation,

Counterclaim-Plaintiff,

v.

EASTON-BELL SPORTS, INC a Delaware
corporation,

Counterclaim-Defendant.

1 Pursuant to Local Rule 6-2, this Stipulated Request is entered into by and between
2 Plaintiff/Counterclaim-Defendant Easton-Bell Sports, Inc. (“Easton-Bell”), and
3 Defendant/Counterclaim-Plaintiff E.I. du Pont de Nemours and Company (“DuPont”) by and
4 through their respective counsel.

5 1. The parties have met and conferred and propose (a) an extension of the deadline to
6 complete the Alternative Dispute Resolution process of Early Neutral Evaluation and (b)
7 amendment to the Case Management Scheduling Order as set forth below.

8 2. The deadline for completing the Alternative Dispute Resolution process of Early Neutral
9 Evaluation currently is set for August 5, 2013, as requested by the parties (Dkt. No. 37).

10 3. The Court entered the Case Management Scheduling Order on May 1, 2013 (Dkt. No.
11 33).

12 4. The parties have met and conferred and propose (a) continuing the deadline for
13 completing Alternative Dispute Resolution to August 26, 2013 and (b) amending the Case
14 Management Scheduling Order as follows:

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Item	Original Deadline in Case Management Report (Dkt. No. 33)	Amended Deadline
Completion of Non-Expert Discovery	September 6, 2013	October 30, 2013
Plaintiff’s disclosure of expert witness opinions	September 27, 2013	November 20, 2013
Defendant’s disclosure of expert testimony and reports	October 28, 2013	December 20, 2013
Close of expert discovery	November 27, 2013	January 15, 2014

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23 5. The parties believe good cause exists for these amendments because they have made
24 significant progress in working toward a potential negotiated settlement, and anticipate that they
25 will be in a position to execute an agreement prior to August 26, 2013. The parties’ proposed
26 deadlines will not affect the Court’s dispositive motion hearing deadline, which will remain as
27 previously set (February 5, 2014).

1 WHEREFORE, the parties respectfully request that the Court enter an Order adopting the
2 deadlines suggested herein.

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5 DATED: August 5, 2013

Respectfully Submitted,
LEE TRAN & LIANG APLC

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9 DATED: August 5, 2013

/s/ Enoch H. Liang
Enoch H. Liang
Attorney for Plaintiff Easton-Bell Sports, Inc.

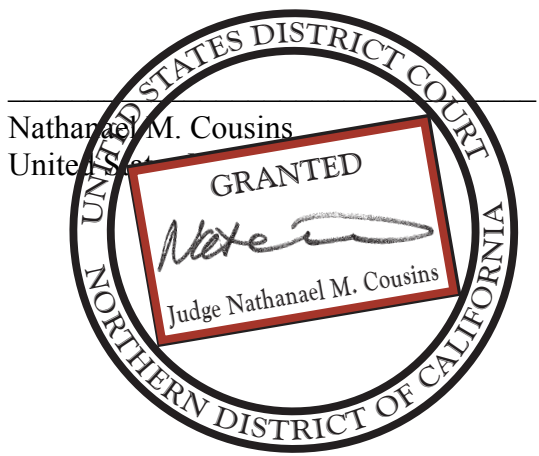
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/s/ Jessica A. Pratt
Jessica A. Pratt
Attorney for Defendant E.I. du Pont de Nemours and
Company

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 DATED: August 6, 2013

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ECF ATTESTATION

I, Jessica A. Pratt, am the ECF user whose identification and password are being used to file the parties' Joint Motion to Continue Deadline for Completing ADR and to Amend Scheduling Order with [PROPOSED] Order. In compliance with Civil Rule 5.1, I hereby attest that concurrence in the filing of this document has been obtained from Lisa Chin. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of August 2013.

/s/ Jessica A. Pratt
Jessica A. Pratt
Attorney for Defendant/Counterclaim-Plaintiff