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Toppan Photomasks, Inc. v. Park

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## STIPULATION

Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park (collectively "the Parties"), participated in a settlement conference before Magistrate Judge Corley on April 28, 2014 where progress was made toward resolving this matter. In order to facilitate further settlement discussions, the Parties stipulate and request that the following dates in the Pretrial Preparation Order (Dkt. No. 53) and Stipulation and Order Regarding Discovery (Dkt. No. 77) be modified as follows:

- Non-Expert Discovery Cutoff extended from June 9, 2014 to July 11, 2014;
- Designation of Experts extended from June 9, 2014 to August 1, 2014;
- Designation of Rebuttal Experts extended from June 23, 2014 to August 29, 2104;
- Expert Discovery Cutoff extended from July 7, 2014 to August 29, 2014;
- Dispositive Motions filing deadline extended from July 18, 2014 to September 19, 2014;
- Meet and Confer (Civil Local Rule 16-10(b)(5)) extended from September 22, 2104 to December 9, 2014;
- Pretrial Conference Date extended from October 28, 2104 at 3:00 pm to April 7 January 13, 2015 at 3:00 pm;
- Jury Trial Date extended from November 10, 2014 at 9:00 am to April
  20, 2015 at 9:00 am, Courtroom 7, 19th Floor.

The Parties further stipulate and request that

- (a) prior to May 28, 2014, the Parties will serve no additional discovery on each other;
- (b) that the Parties may nonetheless follow-up on incomplete discovery already served on each other; and

	II .	
1	(c) this stipulation is not intended to affect Magistrate Judge Spero's	
2	determination of when to schedule a hearing on Plaintiff's pending Motion for	
3	Sanctions. Plaintiff requests that a hearing be set at the Court's earliest convenience.	
4		
5	So stipulated.	
6	DATED: May 8, 2014	THE BUSINESS LITIGATION GROUP, P.C.
7		By:/s/_Marc N. Bernstein
8		MARC N. BERNSTEIN
9		WILL B. FITTON
10		Attorneys for Defendant
11		KEUN TAEK PARK
12		
13	DATED: May 8, 2014	OGLETREE, DEAKINS, NASH, SMOAK &
14	DATED. May 6, 2014	STEWART, P.C.
15		By:/s/ Danielle Ochs
16		DANIELLE OCHS
17		BECKI D. GRAHAM
18		Attorneys for Plaintiff
19		TOPPAN PHOTOMASKS, INC.
20		
21	ATTESTATION OF CONCURRENCE IN FILING	
22	In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the	
23	filing of this document has been obtained from Danielle Ochs.	
24	ORDER	
25	IT IS SO ORDERED.	
26	Dated: May 9, 2014	Mafine M. Chekry
27		Honorable Maxine M. Chesney
28		United States District Judge