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1	WHEREAS, the parties' counsel have met and conferred about the matters addressed in
2	this Stipulation;
3	WHEREAS, pursuant to the Case Management Order (Dkt 528), plaintiffs' deadline to
4	file their papers in Opposition to defendants' motions for summary judgment was May 8, 2017;
5	WHEREAS, on May 18, 2017, plaintiffs filed errata to their prior filings that included a
6	revised brief, over 250 pages of revised exhibits and an additional declaration by an expert
7	witness;
8	WHEREAS, plaintiffs have informed defendants that they anticipate filing an additional
9	document, to be Exhibit 100 to the Declaration of Stephanie Cho, which exhibit plaintiffs state
10	that they have served on defendants on May 19, 2017;
11	WHEREAS, defendants state that they have been prejudiced, in the preparation of their
12	Reply papers in support of their motions for summary judgment, by plaintiffs' untimely and
13	changed filings of plaintiffs' Opposition papers;
14	WHEREAS, plaintiffs contend that defendants suffered no material prejudice (as
15	plaintiffs' errata mainly consisted of missing citations or exhibits to the Cho declaration that were
16	easily identifiable because the bates numbers or transcript citations were listed in the brief, as
17	well as a missing two-page expert declaration that was provided to defendants on May 11, 2017),
18	but agree to the extension stipulated to herein upon defendants' agreement to produce for
19	deposition any expert whose declaration defendants submit in support of their Reply briefs,
20	within seven days after filing; and
21	WHEREAS, there have been no previously stipulated or ordered modifications of the
22	deadline addressed herein;
23	NOW, THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE
24	UNDERSIGNED COUNSEL, HEREBY STIPULATE TO AN ORDER OF THE COURT AS
25	FOLLOWS:
26	The deadline for defendants' Reply papers in support of their motions for summary
27	judgment shall be extended from the original deadline of June 1, 2017 (Dkt 528) to an extended
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	- 1 - SUMMARY JUDGMENT REPLY PAPERS

SUMMARY JUDGMENT REPLY PAPERS CASE NO. 3:13-CV-04115-WHO

1	deadline of June 7, 2017. The dead	line for plaintiffs to take the deposition of any expert whose		
2	declaration defendants submit in support of their Reply briefs shall be June 14, 2017.			
3	IT IS SO STIPULATED.			
4				
5	Dated: May 23, 2017	SQUIRE PATTON BOGGS (US) LLP		
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24		OTTOGI CO., LTD.		
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		- 2 - SUMMARY JUDGMENT REPLY PAPERS		

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		- 3 - SUMMARY JUDGMENT REPLY PAPER CASE NO. 3:13-CV-04115-WH

1	ORDER
2	The deadline for defendants' Reply papers in support of their motions for summary
3	judgment is hereby extended from the original deadline of June 1, 2017 (Dkt 528) to an extended
4	deadline of June 7, 2017. The deadline for plaintiffs to take the deposition of any expert whose
5	declaration defendants submit in support of their Reply papers shall be June 14, 2017.
6	IT IS SO ORDERED.
7	Dated: May 24, 2017
8	The Honorable William H. Orrick III United States District Judge
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	- 4 - STIPULATION RE: TIME TO FILE SUMMARY JUDGMENT REPLY PAPERS CASE NO. 3:13-CV-04115-WHO