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7	Attorneys for Plaintiff/Defendant INTUITIVE SURGICAL, INC.				
8	UNITED STATES DI	STRICT COURT			
9 10	NORTHERN DISTRICT	OF CALIFORNIA			
10	SAN FRANCISCO	O DIVISION			
11	ILLINOIS UNION INSURANCE COMPANY,	CASE NO.: 3:13-cv-04863-JST			
12 13	Plaintiff,	JOINT STIPULATION TO ENTER SCHEDULING ORDER; and			
14	v. INTUITIVE SURGICAL, INC.,	[PROPOSED] ORDER.			
15	Defendant.	Complaint Filed: October 21, 2013			
16	Derendant.	Judge: Hon. Jon S. Tigar Date: May 26, 2016			
17		Time: 2:00 pm Location: Courtroom 9			
18	NAVIGATORS SPECIALTY INSURANCE CO.,	CASE NO.: 3:13-cv-05801-JST			
19	Plaintiff,	Complaint Filed: December 16, 2013			
20	V.				
21	INTUITIVE SURGICAL, INC.,				
22	Defendant.				
23	INTUITIVE SURGICAL, INC.,	CASE NO.: 3:15-cv-04834-JST			
24	Plaintiff,	Complaint Filed: October 20, 2015			
25	V.				
26	ILLINOIS UNION INSURANCE COMPANY; NAVIGATORS SPECIALTY INSURANCE CO.,				
27	Defendants.				
28	1				
	I JOINT STIPULATION TO ENTER SCHEDULING ORDER	CASE NO.: 3:13-cv-04863-JST			
		Dockets.Jus			

1 Intuitive Surgical, Inc. ("Intuitive") and Illinois Union Insurance Company ("Illinois 2 Union") jointly stipulate, pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, to set deadlines for 3 consolidated actions numbered Case No. 3:13-cv-04863-JST and Case No. 3:15-cv-04834-JST, if it 4 pleases this Court.

5 WHEREAS, on May 12, 2016, the parties submitted a joint case management schedule with competing proposed schedules. (Dkt. 171¹.) 6

7 WHEREAS, on May 26, 2016, this Court conducted a case management conference at 8 which the parties' proposed schedules were discussed.

9 WHEREAS, the parties have met and conferred in an attempt to propose a schedule suitable **10** to the Court's calendar.

11 NOW THEREFORE, the parties, through the undersigned counsel, hereby respectfully 12 request that this Court enter the following stipulated case schedule for consolidated actions 13 numbered Case No. 3:13-cv-04863-JST and Case No. 3:15-cv-04834-JST, if such dates are 14 convenient to this Court:

	Event	Date	
	Mediation Deadline	October 15, 2016	
	Close Of Fact Discovery	November 10, 2016	
	Expert Reports Due	December 13, 2016	
	Rebuttal Expert Reports Due	January 17, 2017	
	Close Of Expert Discovery	January 31, 2017	
	Last Day To File Dispositive Motions In Intuitive's Breach Of Contract And Bad Faith Case	February 16, 2017	
	Last Day To File Opposition To Dispositive Motions In Intuitive's Breach Of Contract And Bad Faith Case	March 9, 2017 ²	
¹ Unless otherwise indicated, all docket citations refer to the ECF docket in Illinois Union Ins. Co. v. Intuitive Surgical, Inc., No. 3:13-cv-04863-JST (filed Oct. 21, 2013). ² This briefing schedule of 21 days to file an Opposition and 14 days to file a Reply will apply to any Dispositive Motion filed before February 16, 2017.			

1 2		Last Day To File Reply to (In Intuitive's Breach Of	Opposition to Disposition for the formation of the format	tive Motions aith Case	March 23, 2017
2 3		Pretrial Confe	rence Statement Due		May 5, 2017
4		Pretria	ll Conference		May 26, 2017
5		Jury Trial			June 19, 2017 ³
6					
7	DF	ATED. July 20, 2010	SKADDEN,	ARPS, SLATE,	MEAGHER & FLOM LLP
8			Bv [.]	/s/ James]	P Schaefer
9				Attorr	neys for URGICAL, INC.
10					SKOICAL, INC.
1				COZEN C)'CONNER
12			Bv [.]	/s/ Charles	Wheeler
	By: <u>/s/ Charles Wheeler</u> Attorneys for ILLINOIS UNION INSURANCE COMPANY				
13				IOIS LINION INS	NIRANCHCOMPANY
			ILLIN	IOIS UNION IN	SURANCE COMPANY
4			ILLIN	IOIS UNION IN	SURANCE COMPANY
14 15		Pursuant to Civil Loca			urrence in the filing of this
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14 15 16 17 18 19 20 21 22 23 24 25 26	doo 	cument has been obtained fi	l Rule 5-1(i), the filer rom the signatories at	e attests that conce pove.	urrence in the filing of this s/ James P. Schaefer
 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 		cument has been obtained fi	l Rule 5-1(i), the filer rom the signatories at	e attests that conce pove.	urrence in the filing of this

1		[PROPOSED] ORDER				
2		PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS				
3	0	ORDERED THAT:				
4		The Court enters the following case schedule for consolidated actions numbered Case No.				
5	3:	3:13-cv-04863-JST and Case No. 3:15-cv-04834-JST.:				
6		Event	Date			
7		Mediation Deadline	October 15, 2016			
8		Close Of Fact Discovery	November 10, 2016			
9		Expert Reports Due	December 13, 2016			
10		Rebuttal Expert Reports Due	January 17, 2017			
11		Close Of Expert Discovery	January 31, 2017			
12 13		Last Day To File Dispositive Motions In Intuitive's Breach Of Contract And Bad Faith Case	February 16, 2017			
14		Last Day To File Opposition To Dispositive Motions In Intuitive's Breach Of Contract And Bad Faith Case	March 9, 2017 ¹			
15 16		Last Day To File Reply to Opposition to Dispositive Motions In Intuitive's Breach Of Contract And Bad Faith Case	March 23, 2017			
17		Pretrial Conference Statement Due	May 5, 2017 May 12, 2017			
18		Pretrial Conference	May 26, 2017			
19		Jury Trial	June 19, 2017			
20						
21	D	DATED: July 27, 2016				
22		The Honorable Jon S. Tigar United States District Court Judge				
23			C C			
24						
25						
26						
27 28	ap	¹ This briefing schedule of 21 days to file an Opposition and 14 days to file a Reply will apply to any Dispositive Motion filed before February 16, 2017.				
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