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 ILLINOIS UNION INSURANCE COMPANY

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

11 ILLINOIS UNION INSURANCE
 12 COMPANY, an Illinois corporation,

13 Plaintiff,

14 v.

15 INTUITIVE SURGICAL, INC., a Delaware
 16 corporation,

17 Defendant.

) Case No. 3:13-cv-04863-JST
) Case No. 3:15-cv-04834-JST
) Hon. Jon S. Tigar

) **JOINT STIPULATION TO
) EXTEND EXPERT DEADLINES
) BY 10 DAYS; AND**

) **[PROPOSED] ORDER.**

) Trial Date: June 19, 2017
)

19
 20 And Related Actions.

21 Illinois Union Insurance Company (“Illinois Union”) and Intuitive Surgical,
 22 Inc. (“Intuitive”) jointly stipulate, pursuant to Local Rules 6-1(b), 6-2, and 7-12, to
 23 extend—by 10 days—the expert deadlines in the consolidated actions, Case No. 3:13-
 24 cv-04863-JST and Case No. 3:15-cv-04834-JST, if it pleases the Court.

25 WHEREAS, on July 26, 2016, the parties submitted a Joint Stipulation to Enter
 26 Scheduling Order, which was approved and entered by the Court on July 27, 2016
 27 (ECF No. 186 in Case No. 3:13-cv-04863-JST).
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1 WHEREAS, the Scheduling Order provided for the following expert report and
2 discovery deadlines:

3 Expert Reports Due – December 13, 2016

4 Rebuttal Expert Reports Due – January 17, 2017

5 Close Of Expert Discovery – January 31, 2017

6 WHEREAS, the parties, through their counsel, have agreed to a 10-day
7 extension of the above expert deadlines.

8 NOW THEREFORE, the parties, through their undersigned counsel, hereby
9 respectfully stipulate and request that the Court extend the above expert deadlines by
10 10 days, as follows:

11 Expert Reports Due – ~~December 13, 2016~~ – **December 23, 2016**

12 Rebuttal Expert Reports Due – ~~January 17, 2017~~ – **January 27, 2017**

13 Close Of Expert Discovery – ~~January 31, 2017~~ – **February 10, 2017**

14 The parties further stipulate that this change in the expert deadlines will not
15 change or affect any of the other dates in the Scheduling Order entered on July 27,
16 2016.

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1 DATED: December 8, 2016

COZEN O'CONNOR

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3 By: /s/ Charles E. Wheeler
4 Attorneys for Plaintiff/Defendant
5 ILLINOIS UNION INSURANCE
6 COMPANY

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8 SKADDEN, ARPS, SLATE,
9 MEAGHER, & FLOM LLP

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11 By: /s/ James P. Schaefer
12 Attorneys for Defendant/Plaintiff
13 INTUITIVE SURGICAL, INC.

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15 Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the
16 filing of this document has been obtained from the signatories above.

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18 /s/ Charles E. Wheeler

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[PROPOSED] ORDER

**PURSUANT TO THE FORGOING STIPULATION OF THE PARTIES,
IT IS ORDERED THAT:**

The Court enters the following modifications to the case schedule for the consolidated actions, Case No. 3:13-cv-04863-JST and Case No. 3:15-cv-04834-JST:

Expert Reports Due – ~~December 13, 2016~~ – **December 23, 2016**

Rebuttal Expert Reports Due – ~~January 17, 2017~~ – **January 27, 2017**

Close Of Expert Discovery – ~~January 31, 2017~~ – **February 10, 2017**

DATED: December 8, 2016



The Honorable Jon S. Tigar
United States District Court Judge