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 ILLINOIS UNION INSURANCE COMPANY

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

NAVIGATORS SPECIALTY INSURANCE)
 COMPANY,)

Plaintiff,)

vs.)

INTUITIVE SURGICAL, INC., a Delaware)
 corporation,)

Defendant.)

Case No. 3:13-cv-04863-JST

**STIPULATION TO MODIFY EXPERT
 DISCOVERY DEADLINES; ~~PROPOSED~~
 ORDER**

Judge: Honorable Jon S. Tigar

1 NAVIGATORS SPECIALTY INSURANCE)
 2 COMPANY, a Delaware corporation,)
 3)
 4 Plaintiff,)
 5)
 6 vs.)
 7)
 8 INTUITIVE SURGICAL, INC., a Delaware)
 9 corporation,)
 10)
 11 Defendant.)
 12)

13 The parties to the above-entitled action, through their counsel of record, hereby stipulate as
 14 follows:

15 **RECITALS**

16 1. At a Case Management Conference held on April 23, 2014, the Court adopted the
 17 pre-trial schedule proposed by the parties in their Joint Case Management Statement.

18 2. That schedule established the following deadlines:

19 Designation of Experts: January 5, 2015

20 Designation of Rebuttal Experts: February 9, 2015

21 Close of Fact and Expert Discovery: March 9, 2015

22 3. Upon further consideration, the parties agree that it would be beneficial to wait until
 23 after the close of fact discovery to designate experts.

24 4. In light of this agreement, the parties agree and hereby propose to modify the existing
 25 expert discovery deadlines as follows:

26 Close of Fact Discovery: March 9, 2015

27 Designation of Experts: March 16, 2015

28 Expert Reports Due: April 6, 2015

Designation of Rebuttal Experts: April 22, 2015

Rebuttal Reports Due: May 6, 2015

Close of Expert Discovery: May 29, 2015

5. The parties further stipulate that there is a chance that if the fact discovery deadline is
 changed, it may require a further adjustment of the expert witness schedule.

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IT IS SO STIPULATED.

Dated: January 5, 2015

HINSHAW & CULBERTSON LLP

/s/ John S. Pierce
JOHN S. PIERCE
DAVID J. McMAHON
PETER J. FELSENFELD
Attorneys for Plaintiff
NAVIGATORS SPECIALTY
INSURANCE COMPANY

Dated: January 5, 2015

COZEN & O'CONNOR

/s/ Charles E. Wheeler
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AMANDA M. LORENZ
Attorneys for Plaintiff
ILLINOIS UNION
INSURANCE COMPANY

Dated: January 5, 2015

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/s/ Raoul D. Kennedy
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ORDER

Based on the foregoing Stipulation, and good cause appearing therefor,

IT IS HEREBY ORDERED that the existing expert discovery deadlines will be modified as follows:

Close of Fact Discovery: March 9, 2015

Designation of Experts: March 16, 2015

Expert Reports Due: April 6, 2015

Designation of Rebuttal Experts: April 22, 2015

Rebuttal Reports Due: May 6, 2015

Close of Expert Discovery: May 29, 2015

DATED: January 5, 2015

