1	Stephen Z. Boren (State Bar No. 192024) Ayesha A. Mahapatra (State Bar No. 223475) BOREN, OSHER & LUFTMAN, LLP 5900 Wilshire Boulevard, Suite 920		
2			
3	Los Angeles, California 90036		
4	Telephone: (323) 937-9900 Facsimile: (323) 937-9910		
5	Attorneys for Plaintiffs and Cross-Defendants PETER LLOYD, and VENTOR PROGRESS AB		
6	VENTOR PROGRESS AB		
7			
8	UNITED STATES DISTRICT COURT		
9			
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
11	PETER LLOYD, an individual, VENTOR PROGRESS AB a	) CASE NO.: CV-14-0234 (JSC)	
12	Swedish Limited Company,	STIPULATION TO CONTINUE	
13	Plaintiff,	EXPERT DISCLOSURE DATES  AND ORDER	
14	VS	) AND ORDER	
15	MIKAEL SJÖBLOM, an individual, EURO OFFICE	) }	
16	AMERICÁS, INC. a Delaware	) }	
17	corporation, and DOES 1 through 20, inclusive,	) )	
18	Defendants.	) }	
19		}	
20	EURO OFFICE AMERICAS, INC., a Delaware corporation	<b>)</b>	
21	Cross-claimant,	<b>\</b>	
22	Vs.	<b>\</b>	
23	PETER LLOYD, an individual, VENTOR PROGRESS AB a	Complaint Filed: January 15, 2014	
24	VENTOR PROGRESS AB a Swedish Limited Company,	) )	
25	ROES 1 through 20, inclusive	) )	
26	Cross-defendants.	) )	
27		)	
28			
		STIPULATION TO CONTINUE EXPERT DISCLOSURE DATES	

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## TO THIS HONORABLE COURT:

## **RECITALS**

WHEREAS, on May 30, 2014, this Court entered a Civil Pretrial Order, pursuant to which: (1) initial expert witness disclosures are due on or before September 1, 2014; (2) rebuttal expert witness disclosures are due on or before September 14, 2014; and (3) the expert discovery cut-off is October 14, 2014;

WHEREAS, Defendants and Cross-Complainants are continuing to produce documents, which Plaintiffs and Cross-Defendants must review and provide to their expert witness(es) for consideration in connection with any opinions they may render; and

WHEREAS, the Parties have agreed to continue the expert witness disclosure and cut-off by thirty (30) days to allow the parties' experts, if any, sufficient time in which to prepare their reports and provide meaningful deposition testimony.

## **STIPULATION**

The Parties, through their counsel of record, hereby stipulate and agree to the following amendments to this Court's Civil Pretrial Order:

- 1. Initial Expert Witness Disclosures will be due on or before October 1, 2014:
- 2. Rebuttal Expert Witness Disclosures will be due on or before October 14, 2014; and

1	3. The Expert Discovery Cut-Off shall be November 14, 2014.	
2	IT IS SO STIPULATED.	dut-Off shan of November 14, 2014.
3	II IS SO SIN CLATED.	
4	Dated: August 27, 2014	BOREN, OSHER & LUFTMAN, LLP
5	Dated. August 27, 2014	DOKEN, OSHER & LOF IWAN, LLF
6		
7		By: /s/ Stephen Z. Boren
8		STEPHEN Z. BOREN Attorneys for Plaintiffs and Cross-Defendants
9		Defendants
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11		
12	Dated: August 27, 2014	TIMOTHY THOMAS O'CONNOR
13		
14		Pro /s/T O'Connor
15		By: /s/ T. O'Connor  Attorney for Defendants and Cross-
16		Complainants
17		
18		
19	<del>[PROPOSED]</del> ORDER	
20	PURSUANT TO STIPULATION, IT I	S SO ORDERED:
21	DATED: August 27, 2014	JACQUELINE SCOTT CORLEY
22		JACQUELINE SCOTT CORLEY United States Magistrate Judge
23		Officed States Magistrate Judge
24		
25		
26		
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28		STIPULATION TO CONTINUE EXPERT
1	a .	

**DISCLOSURE DATES** 

$1 \mid$	PROOF OF SERVICE			
2	CASE NO. CV-14-0234 (JSC)			
3	STATE OF CALIFORNIA )			
5	) ss. COUNTY OF LOS ANGELES )			
6				
7	the age of 18 and not a party to the within action; my business address is [X]:			
8	Wilshire Blvd., Ste. 920, Los Angeles, California 90036.			
9	On August 27, 2014, I served the foregoing document(s) described as:			
10	STIPULATION TO CONTINUE EXPERT DISCLOSURE DATES			
11	on the interested party(ies) in this action by placing a true copy(ies) thereof,			
12				
13	T. O'Connor, Esq.			
14	T. O'Connor and Duke			
15	133 Court Street Auburn, CA 95603			
16	Attorney for Defendants			
17	[X] (MAIL) I am "readily familiar" with Boren, Osher & Luftman, LLP's practice			
18	of collection and processing correspondence for mailing. Under the practice the			
19	correspondence would be deposited with the U.S. postal service on the same day with postage thereof fully prepaid at Los Angeles, California in the ordinary course			
20	of business. I am aware that on motion of the party served, service is presumed			
21	invalid if postage cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.			
22	INTERPORTATION OF A STATE OF THE STATE OF TH			
23	[X] (FEDERAL) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of			
24	perjury under the laws of the United States that the above is true and correct.			
25	Executed on August 27, 2014, at Los Angeles, California			
26				
27	Hanna Lee Print or Type Name Signature			
28				