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 Attorneys for Defendant
 8 REGENTS OF THE UNIVERSITY OF CALIFORNIA

9 UNITED STATE DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO

11 KULGINDER SRAN,)	Case No. C-15-4471-JST
)	
12)	STIPULATION AND [PROPOSED]
13 Plaintiff,)	ORDER CONTINUING EXPERT
)	REBUTTAL AND EXPERT
14 vs.)	DISCOVERY DEADLINES
)	Complaint Filed: September 30, 2015
15)	
16 REGENTS OF THE UNIVERSITY OF)	
CALIFORNIA)	
)	
17 Defendants.)	
18)	

19 **RECITALS**

20
 21 WHEREAS the parties have exchanged written discovery and substantial documents in
 22 the case, conducted numerous witness depositions, and otherwise diligently worked together to
 23 move the case forward;

24 WHEREAS the current deadline to disclose rebuttal expert witnesses is May 1, 2017;

25 WHEREAS the current expert discovery cutoff is May 15, 2017;

26 WHEREAS the parties are in the process of completing substantial expert witness
 27 discovery;

28 WHEREAS both parties anticipate disclosing rebuttal expert witnesses;

WHEREAS both parties anticipate taking multiple expert witness depositions;

WHEREAS the parties have identified an issue impacting the scope of testimony to be provided by expert witnesses relating to the issue of damages and therefore require additional time to meet and confer about the issue so as to reach a possible agreement;

WHEREAS the parties need additional time to meaningfully conduct expert witness discovery thereafter;

WHEREAS the parties are still in active settlement negotiations with Justice Lambden of ADR Services following mediation on November 15, 2016, and would like to continue participating in settlement discussions;

WHEREAS the parties respectfully request that the Court continue the current expert discovery deadlines as outlined by the parties below, or as soon thereafter as the Court is available.

WHEREAS the continuance of the deadlines as proposed below will not impact the August 14, 2017 trial date, or any other deadlines set by this Court.

WHEREAS, alternatively, the parties request a CMC to further discuss these issues with the Court.

STIPULATION

THEREFORE, IT IS HEREBY STIPULATED THAT the expert rebuttal and expert discovery cutoff deadlines are continued as follows:

Event	Current Date	Proposed Date
Expert rebuttal	May 1, 2017	June 16, 2017
Expert Discovery Cutoff	May 15, 2017	June 30, 2017

///

1 Dated: April 20, 2017

GORDON & REES
SCULLY MANSUKHANI LLP

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3 By: /s/ Jennifer M. Lynch
JENNIFER M. LYNCH
4 Attorney for Defendant
5 REGENTS OF THE UNIVERSITY OF
CALIFORNIA

6 Dated: April 20, 2017

LEIGH LAW GROUP

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8 By: /s/ Jay Jambeck
Jay Jambeck
9 Attorney for Plaintiff
KULGINDER SRAN

10 **~~[PROPOSED]~~ ORDER**

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12 According to the parties' stipulation, and good cause appearing, it is hereby ordered that
13 the expert rebuttal and expert discovery cutoff deadlines of this matter are hereby continued as
14 follows:

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Event	Current Date	Proposed Date
Expert rebuttal	May 1, 2017	June 16, 2017
Expert Discovery Cutoff	May 15, 2017	June 30, 2017

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19 IT IS SO ORDERED.

20 Dated: April 25, 2017

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Hon. Jon S. Tigar