

1 DAVID H. KRAMER, State Bar No. 168452
 SARA E. ROWE, State Bar No. 295353
 2 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 3 650 Page Mill Road
 Palo Alto, CA 94304-1050
 4 Telephone: (650) 493-9300
 Facsimile: (650) 565-5100
 5 Email: dkramer@wsgr.com
 Email: srowe@wsgr.com

6 COLLEEN BAL, State Bar No. 167637
 7 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 8 One Market Plaza
 Spear Tower, Suite 3300
 9 San Francisco, CA 94105-1126
 Telephone: (415) 947-2000
 10 Facsimile: (415) 947-2099
 Email: cbal@wsgr.com

11 *Attorneys for Defendant Square, Inc.*

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 ROBERT WHITE., an individual,
 Plaintiffs,
 17 v.
 18 SQUARE, INC., a Delaware corporation,
 19 Defendants.
 20
 21
 22
 23

Case No. 3:15-cv-04539-JST
**JOINT STIPULATION AND
 [PROPOSED] SCHEDULING
 ORDER**

1 WHEREAS, the Court dismissed Plaintiff's First Amended Complaint with leave to
2 amend on April 19, 2016 (Dkt. 38);

3 WHEREAS, Plaintiff filed its Second Amended Complaint on April 29, 2016 (Dkt. 39);

4 WHEREAS, Defendant Square, Inc. ("Square") moved to dismiss Plaintiff's Second
5 Amended Complaint on June 10, 2016 (Dkt. 44);

6 WHEREAS, the hearing on Square's Motion to Dismiss the Second Amended Complaint
7 is scheduled to be held on August 11, 2016;

8 WHEREAS, on January 13, 2016, the Court issued a Scheduling Order establishing
9 deadlines and dates for discovery and trial;

10 WHEREAS, the parties agree that due to the unresolved state of the pleadings, the current
11 schedule should be extended to allow further time for discovery;

12 NOW THEREFORE, the parties hereby stipulate, subject to the Court's approval, as
13 follows:

14 **STIPULATION**

15 1. The discovery and trial deadlines will be altered as follows:

Event	Current Deadline	New Deadline
Fact discovery cut-off	August 1, 2016	November 1, 2016
Expert disclosures	August 19, 2016	November 21, 2016
Expert rebuttal	September 9, 2016	December 19, 2016
Expert discovery cut-off	September 23, 2016	January 13, 2017
Deadline to file dispositive motions	October 7, 2016	February 2, 2017
Pretrial conference statement due	December 13, 2016	March 21, 2017
Pretrial conference	January 6, 2017 at 2:00 p.m.	April 14, 2017 at 2:00 p.m. or such other time as set by the Court
Trial	January 30, 2017 at 8:30 am	May 8, 2017 8:30 a.m. or such other time as set by the Court

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: June 16, 2016

MCGRANE PC

By: /s/ William McGrane
William McGrane

Attorneys for Plaintiff
ROBERT WHITE

DATED: June 16, 2016

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Colleen Bal
Colleen Bal

Attorneys for Defendant
SQUARE, INC.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

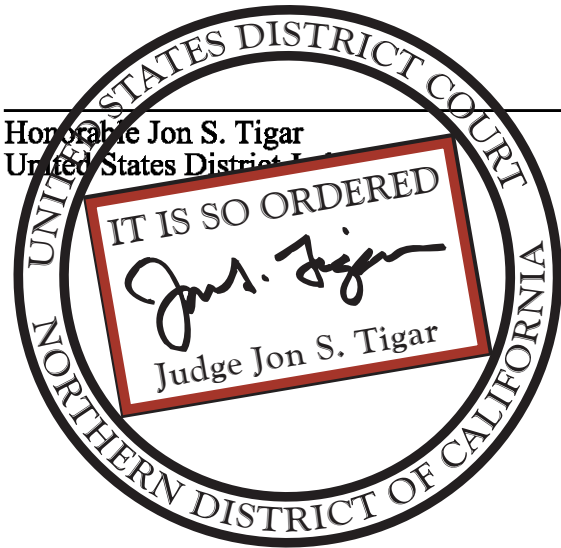
2

3 DATED: June 16, 2016

4

Honorable Jon S. Tigar
United States District Judge

5



6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28