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November 6, 2015

Chief District Judge Phyllis J. Hamilton
United States District Court
Northern District of California
Oakland Courthouse, Courtroom 3 - 3rd Floor
1301 Clay Street, Oakland, CA 94612Re: Maktab Tarighe, et al v. Ali Kianfar, et al
U.S.D.C. for the Northern District of California
Case No.: 4:95-cv-02881-PJH
Our File: 718-35347-3

Your Honor:

Under the Court's Order dated August 12, 2015 (Docket No. 158), the non-expert discovery cutoff in the captioned matter is November 30, 2015. Pursuant to Local Rules 7-11 and 7-12, the parties hereby jointly request that this deadline be extended fifteen (15) days, to and including December 15, 2015.

Good cause supports this joint request. *First*, the extension will grant the parties the opportunity to advance a recent and productive line of settlement discussions without the burden of completing non-expert discovery simultaneously. The parties for many years have been unable to agree as to what they can and cannot do with regard to possible future actions about the trademarks at issue. Through the work of counsel, including personal counsel for the defendants, they have come to terms on this set of issues. The only remaining issue is financial, and that is in the hands of the defendants' carrier. *Second*, the extension will not affect the overall case schedule delineated in the Court's December 9, 2014 Case Management Order (Docket No. 133). Pursuant to that Order, expert disclosures are not due until January 15, 2016, a month after the new non-expert cutoff proposed here. *Third*, this 15-day extension is narrowly tailored to meet the needs of the parties and to address any scheduling difficulties created by the approaching Thanksgiving holiday.

The parties' request to extend the non-expert discovery cutoff from November 30, 2015 to December 15, 2015 is GRANTED.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 9, 2015

The Honorable
United States District Judge

