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 15 INTERNATIONAL, SEAGATE
 16 SINGAPORE INTERNATIONAL
 17 HEADQUARTERS PTE LTD

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 OAKLAND DIVISION

21 SEAGATE TECHNOLOGY LLC, a
 22 Delaware corporation,
 23 SEAGATE TECHNOLOGY
 24 INTERNATIONAL, a Cayman Islands
 25 Company; SEAGATE SINGAPORE
 26 INTERNATIONAL HEADQUARTERS
 27 PTE LTD, a Singapore corporation,

28 Plaintiffs,

vs.

29 NATIONAL UNION FIRE INSURANCE
 30 COMPANY OF PITTSBURGH, PA, a
 31 Pennsylvania corporation; INSURANCE
 32 COMPANY OF THE STATE OF
 33 PENNSYLVANIA, a Pennsylvania
 34 corporation,

Defendants.

Case No. 4:09-cv-04120-CW

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME PURSUANT TO CIVIL
 L.R. 6-2; ~~PROPOSED~~ ORDER**

Judge: Hon. Claudia Wilken
 Courtroom: 2

Complaint Filed: September 4, 2009

35 Pursuant to Civil L.R. 6-2, the parties, through their undersigned counsel, submit the
 36 following stipulation and request an order changing time:

37 WHEREAS, the Court filed a Minute Order and Case Management Order on December

1 18, 2009 (the “December 18 Order”), which set the schedule for the above-captioned case as
2 follows:

- 3 • 1/12/10: Completion of briefing on Plaintiffs’ summary judgment
4 motion as to Defendant Insurance Company of the State of
5 Pennsylvania’s (“ISOP”) duty to defend and Defendants’
6 motion to compel arbitration
- 7 • 3/31/10: Completion of ADR session
- 8 • 6/15/10: Completion of fact discovery
- 9 • 6/18/10: Disclosure of identities and reports of expert witnesses
- 10 • 7/09/10: Disclosure of expert rebuttal reports
- 11 • 7/30/10: Completion of expert discovery
- 12 • 8/12/10: Defendants to file case-dispositive motion
- 13 • 8/26/10: Plaintiff to file opposition to case-dispositive motion and any
14 cross-motion
- 15 • 9/2/10: Defendants to file reply/opposition to cross-motion
- 16 • 9/9/10: Plaintiff to file reply in support of cross-motion
- 17 • 9/23/10: Hearing of all case-dispositive motions and further case
18 management conference
- 19 • 3/29/11: Final pre-trial conference
- 20 • 4/11/11: 10-day jury trial to begin

21 WHEREAS, the parties completed briefing on Plaintiffs’ summary judgment motion and
22 Defendants’ motion to compel arbitration and the ADR session within the schedule set forth in
23 the December 18 Order;

24 WHEREAS, the parties have engaged in fact discovery and are continuing to do so;

25 WHEREAS, neither Plaintiffs nor Defendants expect to be able to complete fact discovery
26 by the June 15, 2010 deadline;

27 WHEREAS, the parties believe and agree that they need approximately four months from
28 today’s date to complete fact discovery, as they require additional written and document

1 discovery, the resolution of disputes regarding written and document discovery, and the taking of
2 depositions;

3 WHEREAS, the deadlines for the completion of fact and expert discovery and the hearing
4 of dispositive motions may be extended without any effect on the current final pre-trial
5 conference and the trial date;

6 WHEREAS, the parties have never before requested from this Court an extension of any
7 deadline in this case;

8 THEREFORE, IT IS HEREBY STIPULATED THAT:

9 Subject to the Court's approval of this Stipulation, the schedule set forth in the December
10 18 Order shall be modified as follows:

- 11 • 8/27/10: Completion of fact discovery
- 12 • 8/30/10: Disclosure of identities and reports of expert witnesses
- 13 • 9/20/10: Disclosure of expert rebuttal reports
- 14 • 10/8/10: Completion of expert discovery
- 15 • 10/21/10: Defendants to file case-dispositive motion
- 16 • 11/4/10: Plaintiff to file opposition to case-dispositive motion and any
17 cross-motion
- 18 • 11/11/10: Defendants to file reply/opposition to cross-motion
- 19 • 11/18/10: Plaintiff to file reply in support of cross-motion
- 20 • 12/9/10 at 2:00 p.m.: Hearing of all case-dispositive motions and further
21 case management conference
- 22 • 3/29/11 at 2:00 p.m.: Final pre-trial conference (UNCHANGED)
- 23 • 4/11/11 at 8:30 a.m.: 10-day jury trial to begin (UNCHANGED)

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Dated: May 7, 2010

FARELLA BRAUN + MARTEL LLP

I represent that concurrence in the filing of this document has been obtained from the other signatory, which shall serve in lieu of her signature on this document.

By: /s/ Tyler C. Gerking
Tyler C. Gerking

Attorneys for Plaintiffs
SEAGATE TECHNOLOGY LLC, SEAGATE TECHNOLOGY INTERNATIONAL, SEAGATE SINGAPORE INTERNATIONAL HEADQUARTERS PTE LTD

Dated: May 7, 2010

LEWIS BRISBOIS BISGAARD & SMITH, LLP

By: /s/ Rebecca R. Weinreich
Rebecca R. Weinreich

Attorneys for Defendants
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: MAY 10, 2010



JUDGE CLAUDIA WILKEN
United States District Judge