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8 Attorneys for Plaintiff and Counterclaim Defendant
 9 JAMES P. VICE

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO/OAKLAND DIVISION

13 JAMES P. VICE, an individual,
 14 Plaintiff,

15 vs.

16 WOODLINE USA, INC.,
 17 a Tennessee Corporation,
 18 Defendant.

No. 4:10-cv-04103-CW

JOINT STIPULATION TO EXTEND TIME OF
 DEADLINE DATES ISSUED IN CASE
 MANAGEMENT ORDER OF FEBRUARY 8,
 2011 AND ORDER

19 Pursuant to Civil L.R. 6.2, Plaintiff and Counterclaim Defendant JAMES P. VICE and
 20 Defendant and Counterclaim Plaintiff WOODLINE USA, INC. do hereby submit this Joint
 21 Stipulation Extending Case Management Order Deadline Dates Issued on February 8, 2011 for
 22 an additional 60 days from the presently deadline dates.

23 The parties submit this Stipulation on the basis that the parties participated in the court-
 24 ordered Early Neutral Evaluation on May 5, 2011 , which was conducted later than originally
 25 anticipated, and the parties are evaluating the results and considering settlement options and
 26 believe with additional time the parties may likely resolve their issues.

27 Based on the foregoing, the parties respectfully request the Court grant an additional 60
 28 days for the parties to comply with the claim construction proceedings according to the patent
 local rules; and complete all fact discovery, including expert discovery as required by the Court's

1 Case Management Order of February 8, 2011 as follows:

- 2 1. Completion of Fact Discovery from June 15, 2011 to August 15, 2011;
- 3 2. Disclosure of identities and reports of expert witnesses from July 1, 2011 to
- 4 September 1, 2011;
- 5 3. Completion of Expert Discovery from August 3, 2011 to October 3, 2011; and
- 6 4. All other dates issued in the Court's Case Management Order of February 8, 2011
- 7 shall remain the same.

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9 June _____, 2011

Respectfully Submitted,

Patton Martin & Sullivan LLP

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13 By: _____

14 Kevin R. Martin

15 Attorneys for Plaintiff and Counterclaim

16 Defendant JAMES P. VICE

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18 June _____, 2011

Haverstock & Owens LLP

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21 By: _____

22 Chris Kao

23 Attorneys for Defendant and

24 Counterclaim Plaintiff WOODLINE USA, INC.

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ORDER

Having considered the parties request and Joint Stipulation To Extend Time of Deadline Dates issued in the Case Management Order of February 8, 2011, therefore, the Court hereby orders that the deadline for the parties to complete all fact discovery, including expert discovery as required by the Court's Case Management Order of February 8, 2011 is extended for 60 days as follows:

1. Completion of Fact Discovery is August 15, 2011;
2. Disclosure of identities and reports of expert witnesses September 1, 2011;
3. Completion of Expert Discovery is October 3, 2011;
4. Compliance with the Claim Construction Proceedings of the Patent Local Rules is extended by 60 days; and
5. All other dates issued in the Court's Case Management Order of February 8, 2011 shall remain the same.

IT IS SO ORDERED.

Date: 6/20/2011



HONORABLE CLAUDIA WILKEN
United States District Court Judge