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14 Attorneys for Plaintiff
15 ROSS, SINCLAIRE & ASSOCIATES, LLC
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSS, SINCLAIRE & ASSOCIATES,
LLC,

Plaintiffs,

vs.

PREMIER SENIOR LIVING, LLC;
PREMIER SENIOR LIVING
DELAWARE, LLC; 5690 STATE
BRIDGE, LLC; 8700 LAWYERS, LLC;
460 MEDLOCK, LLC; 6441 HOLDER,
LLC; 2147 DAVIE, LLC; 915 HOOK,
LLC; 5835 MEDLOCK BRIDGES, LLC;
1049 ANNA KNAPP, LLC; and 1224
VILLAGE CREEK, LLC,

Defendants.

Case No. 3:11-cv-05104-PJH-NJV

Honorable Phyllis J. Hamilton
Magistrate Nandor J. Vadas

**STIPULATED DISCOVERY
SCHEDULE; ~~PROPOSED~~ ORDER
SETTING DISCOVERY SCHEDULE**

Complaint Filed: October 18, 2011
Trial Date: Not Assigned

STIPULATED DISCOVERY SCHEDULE

2 Pursuant to this Court's December 22, 2011 Order granting Plaintiff's Motion for
3 Expedited Discovery, Plaintiff Ross, Sinclair & Associates, LLC ("RSA") and Defendants
4 Premier Senior Living, LLC; Premier Senior Living Delaware, LLC; 5690 State Bridge, LLC;
5 8700 Lawyers, LLC; 460 Medlock, LLC; 6441 Holder, LLC; 2147 Davie, LLC; 915 Hook, LLC;
6 5835 Medlock Bridges, LLC; 1049 Anna Knapp, LLC; and 1224 Village Creek, LLC
7 (collectively, "Defendants"), submit this stipulated discovery schedule:

- **January 10, 2012:** Last day to propound written discovery
 - **February 3, 2012:** Last day to respond to written discovery
 - **February 13 – March 9, 2012:** All depositions completed
 - **March 30, 2012:** Last day to file Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **April 13, 2012:** Last day to file Oppositions to Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **April 23, 2012:** Last day to file Replies in support of Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **May 4, 2012:** Approximate date for Hearings on Motion to Compel Arbitration and Motion for Preliminary Injunction

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1 The parties respectfully request this Court order the discovery schedule as set forth above.
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4 Respectfully submitted,
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7 Dated: January 4, 2012
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10 **BRYAN CAVE LLP**
11 James Goldberg
12 Kenneth Lee Marshall
13 Mary Gassmann Reichert
14 Bahareh Mostajelean
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17 By: /s/ Bahareh Mostajelean
18 Bahareh Mostajelean
19

20 Attorneys for Plaintiff
21 ROSS, SINCLAIRE & ASSOCIATES, LLC
22
23

24 Dated: January 4, 2012
25
26

27 **SHEPHERD SMITH EDWARDS & KANTAS, LLP**
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30 By: /s/ Samuel B. Edwards
31 Samuel B. Edwards
32

33 Attorneys for Defendants
34 PREMIER SENIOR LIVING, LLC; PREMIER
35 SENIOR LIVING DELAWARE, LLC; 5690 STATE
36 BRIDGE, LLC; 8700 LAWYERS, LLC; 460
37 MEDLOCK, LLC; 6441 HOLDER, LLC; 2147
38 DAVIE, LLC; 915 HOOK, LLC; 5835 MEDLOCK
39 BRIDGES, LLC; 1049 ANNA KNAPP, LLC; and
40 1224 VILLAGE CREEK, LLC
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[PROPOSED] ORDER SETTING DISCOVERY SCHEDULE

2 **FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED** that the Stipulated
3 Discovery Schedule of Plaintiff Ross, Sinclaire & Associates, Inc. (“RSA”) and Defendants
4 Premier Senior Living, LLC; Premier Senior Living Delaware, LLC; 5690 State Bridge, LLC;
5 8700 Lawyers, LLC; 460 Medlock, LLC; 6441 Holder, LLC; 2147 Davie, LLC; 915 Hook, LLC;
6 5835 Medlock Bridges, LLC; 1049 Anna Knapp, LLC; and 1224 Village Creek, LLC
7 (collectively, “Defendants”) is **GRANTED**.

8 **IT IS HEREBY ORDERED** that Discovery may proceed according to the following
9 schedule:

- **January 10, 2012:** Last day to propound written discovery
 - **February 3, 2012:** Last day to respond to written discovery
 - **February 13 – March 9, 2012:** All depositions completed
 - **March 30, 2012:** Last day to file Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **April 13, 2012:** Last day to file Oppositions to Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **April 23, 2012:** Last day to file Replies in support of Motion to Compel Arbitration and Motion for Preliminary Injunction
 - **May 4, 2012:** Approximate date for Hearings on Motion to Compel Arbitration and Motion for Preliminary Injunction

21 || IT IS SO ORDERED.

Dated: January 4, 2012


NANDOR J. VADAS
United States Magistrate Judge