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ROSS, SINCLAIRE & ASSOCIATES, LLC  
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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

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14 ROSS, SINCLAIRE & ASSOCIATES,  
LLC,

15 Plaintiffs,

16  
17 vs.

18 PREMIER SENIOR LIVING, LLC;  
19 PREMIER SENIOR LIVING  
DELAWARE, LLC; 5690 STATE  
20 BRIDGE, LLC; 8700 LAWYERS, LLC;  
460 MEDLOCK, LLC; 6441 HOLDER,  
21 LLC; 2147 DAVIE, LLC; 915 HOOK,  
LLC; 5835 MEDLOCK BRIDGES, LLC;  
22 1049 ANNA KNAPP, LLC; and 1224  
VILLAGE CREEK, LLC,

23 Defendants.  
24

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

Honorable Phyllis J. Hamilton  
Magistrate Nandor J. Vadas

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

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

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TWO EMBARCADERO CENTER, SUITE 1410  
SAN FRANCISCO, CALIFORNIA 94111

1 **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:

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

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The parties respectfully request this Court order the discovery schedule as set forth above.

Respectfully submitted,

Dated: January 4, 2012

**BRYAN CAVE LLP**  
James Goldberg  
Kenneth Lee Marshall  
Mary Gassmann Reichert  
Bahareh Mostajelean

By:           /s/ Bahareh Mostajelean            
Bahareh Mostajelean  
Attorneys for Plaintiff  
ROSS, SINCLAIRE & ASSOCIATES, LLC

Dated: January 4, 2012

**SHEPHERD SMITH EDWARDS & KANTAS, LLP**

By:           /s/ Samuel B. Edwards            
Samuel B. Edwards  
Attorneys for Defendants  
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

1                    ~~[PROPOSED]~~ ORDER SETTING DISCOVERY SCHEDULE

2                    **FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED** that the Stipulated  
3 Discovery Schedule of Plaintiff Ross, Sinclair & 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:

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

21 **IT IS SO ORDERED.**

22  
23  
24 Dated: January 4, 2012



25 NANDOR J. VADAS  
26 United States Magistrate Judge  
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