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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
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18 GIANNI VERSACE, S.P.A. and VERSACE
 USA, Inc.

Case No. 4:16-cv-03617-HSG

19 Plaintiffs,
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**STIPULATION AND [PROPOSED]
 ORDER MODIFYING CASE SCHEDULE**

21 vs.

22 VERSACE 19.69 ABBIGLIAMENTO
 SPORTIVO S.R.L., THEOFANIS PAPADAS,
 V1969 VERSACE SMO LLC, V1969
 23 VERSACE HG LLC, and V1969 USA LLC.

24 Defendants.
 25

26 Plaintiffs Gianni Versace, S.p.A. and Versace USA, Inc. (“Versace”), Defendants Versace
 27 19.69 Abbigliamento Sportivo, S.r.l. and Theofanis Papadas (“VAS Defendants”), and Defendants
 28 V1969 Versace SMO LLC, V1969 Versace HG LLC, and V1969 USA LLC (“Licensee

1 Defendants”) (collectively, “Parties”), by and through their respective counsel of record, hereby
2 stipulate and agree as follows:

3 WHEREAS, on March 9, 2017, the Court issued a Scheduling Order setting this case for
4 trial on March 26, 2018, and related case deadlines, including the close of fact discovery which is
5 set for August 30, 2017. [Dkt No. 112];

6 WHEREAS, lead counsel for Versace will be unavailable between August 7 and 25, 2017,
7 due to her wedding and honeymoon, and therefore respectfully requests that the close of fact
8 discovery be continued by one month until September 30, 2017, and is filing a declaration
9 concurrently herewith to explain why this scheduling issue was not raised with the Court before or
10 upon issuance of the Scheduling Order;

11 WHEREAS, because the case deadlines in the Scheduling Order were compact and in light
12 of the intervening holiday season, even a relatively short, one-month extension of the fact
13 discovery deadline impacts the remaining case deadlines in a way that does not allow the Parties
14 sufficient time to prepare for, and the Court sufficient time to resolve, dispositive motions in
15 advance of a March 26, 2018 trial date;

16 WHEREAS, counsel for Versace, the VAS Defendants and the Licensee Defendants have
17 met and conferred and have stipulated to the following schedule, subject to approval by the Court,
18 setting the case for trial on May 28, 2018, the pretrial conference for May 15, 2018, and the
19 dispositive motion hearing date for February 22, 2018—all dates which the Parties have confirmed
20 the Court’s availability with the Court’s Calendar Clerk and Courtroom Deputy;

21 NOW THEREFORE, Versace, the VAS Defendants, and the Licensee Defendants hereby
22 agree to the following modified case schedule, subject to approval by the Court:

23

Close of Fact Discovery	September 30, 2017
Exchange of Opening Expert Reports	October 31, 2017
Exchange of Rebuttal Expert Reports	November 21, 2017
Close of Expert Discovery	December 21, 2017
File Dispositive Motions	January 18, 2018
Dispositive Motion Hearing Deadline	February 22, 2018, at 2:00 p.m.
Pretrial Conference	May 15, 2018, at 8:30 a.m.
Jury Trial (10 days)	May 28, 2018, at 8:30 a.m.

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1 **IT IS SO STIPULATED.**

2 DATED: May 24, 2017

MUNGER, TOLLES & OLSON LLP

3
4 By: /s/ Rosemarie T. Ring

Rosemarie T. Ring
Attorney for Gianni Versace, S.p.A. and Versace USA, LLC

6 DATED: May 24, 2017

MILLER STARR REGALIA

8 By: /s/ David Harris

9 David Harris
10 Attorney for Versace 19.69 Abbigliamento Sportivo, S.r.L and Theofanis Papadas

11 DATED: May 24, 2017

ADAM S. ROSSMAN, ESQ.

12 By: /s/ Adam S. Rossman

13 Adam S. Rossman
14 Attorney for V1969 Versace SMO LLC,
15 V1969 Versace HG LLC, and V1969 USA LLC

16 Pursuant to Civil Local Rule 5-1(ii)(3), the filer attests that concurrence in the filing of this
17 document has been obtained from each of the above signatories.

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[PROPOSED] ORDER

Pursuant to the foregoing Stipulation and [Proposed] Order Modifying Case Schedule, and for good cause shown, the Court sets the following case deadlines pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rule 16-10:

Close of Fact Discovery	September 30, 2017
Exchange of Opening Expert Reports	October 31, 2017
Exchange of Rebuttal Expert Reports	November 21, 2017
Close of Expert Discovery	December 21, 2017
File Dispositive Motions	January 18, 2018
Dispositive Motion Hearing Deadline	February 22, 2018, at 2:00 p.m.
Pretrial Conference	May 15, 2018, at 8:30 a.m.
Jury Trial (10 days)	May 28, 2018, at 8:30 a.m.

IT IS SO ORDERED.

DATED: 5/25/2017


Hon. Haywood S. Gilliam, Jr.