

1 JAMES L. JACOBS, State Bar No. 158277
2 BARBARA E. TANZILLO, State Bar No. 168339
3 GCA LAW PARTNERS LLP
4 1891 Landings Drive
5 Mountain View, CA 94043
Telephone: (650) 428-3900
Facsimile: (650) 428-3901
e-mail: jjacobs@gcalaw.com
e-mail: btanzillo@gcalaw.com

6 Attorneys for Defendants
7 NAVEEN CHANANA, SANJEEV TYAGI
AND GAURAV GAUBA

13 JAMES WARD,
14 Plaintiff,
15 vs.
16 NAVEEN CHANANA, SANJEEV TYAGI,
17 GAUREV GAUBA and DOE 1 through
DOE 20, inclusive,
18 Defendants

No. C07 6290 JW

STIPULATION AND [REDACTED]
ORDER TO CHANGE TIME FOR ADR
AND TO MODIFY JANUARY 28, 2009
SCHEDULING ORDER

21 WHEREAS, as more fully set forth below, through this Stipulation, Plaintiff James
22 Ward and Defendants Naveen Chanana, Sanjeev Tyagi and Gaurev Gauba, jointly seek an
23 order revising various deadlines scheduled in this case to enable an orderly completion of
24 discovery and to permit the parties to participate in the Court's ADR program;

25 WHEREAS, pursuant to the Scheduling Order dated January 28, 2009 (the
26 "Scheduling Order"), this Court scheduled the following deadlines for this case:

1	Close of All Discovery	December 14, 2009
2	Last Date for Hearing Dispositive Motions <i>(≈ 60 days after the Close of All Discovery)</i>	February 22, 2010
3		
4	Preliminary Pretrial Conference <i>(≈ 30 days before the Close of All Discovery)</i>	November 16, 2009
5		
6	Preliminary Pretrial Conference Statements <i>(Due 10 days before conference)</i>	November 6, 2009
7		
8	Deadline for parties to contact Court's ADR Program <i>(15 days after the date of this Order)</i>	February 12, 2009
9		

10 WHEREAS, the parties contacted the Court's ADR Program to discuss an
 11 appropriate ADR process for this case by February 12, 2009 and understood that this
 12 matter would be recommended for ADR, and that the parties should await the issuance of
 13 the Court's order regarding ADR;

14 WHEREAS, the parties have not yet been ordered to ADR;

15 WHEREAS, the parties have engaged in discovery but have not yet completed
 16 discovery and there remains additional outstanding discovery that the parties intend to
 17 pursue and for which they desire additional time to enable them to complete that discovery
 18 in the most efficient manner;

19 WHEREAS, in addition, one of the Defendants is presently out of the country and
 20 is scheduled to be out of the country through the current deadline for the close of discovery
 21 and therefore will not be available in California to be deposed before the current deadline
 22 for the close of discovery;

23 WHEREAS, all parties desire to have an additional period of approximately four
 24 months to fully complete discovery as well as to participate in the Court's ADR Program;

25 WHEREAS, the parties believe that a modification to the current Scheduling Order
 26 will enable them to complete discovery in an efficient manner and will also enable them to
 27 participate in the Court's ADR Program prior having to complete discovery, which could
 28 result in additional cost savings and efficiencies.

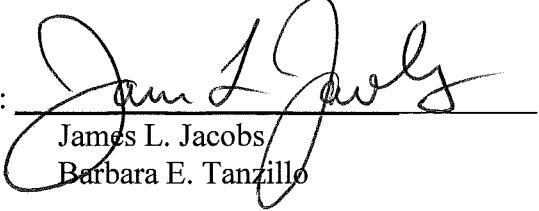
1 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE
2 PARTIES HERETO THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:

3 1. That the operative dates set forth in the Court's Scheduling Order be revised
4 as follows:

EVENT	OLD DEADLINE	NEW DEADLINE
Close of All Discovery	Dec. 14, 2009	March 15, 2010
Last Date for Hearing Dispositive Motions (≈ 60 days after the Close of All Discovery)	Feb. 22, 2010	May 17, 2010
Preliminary Pretrial Conference (≈ 30 days before the Close of All Discovery)	Nov. 16, 2009	February 22, 2010
Preliminary Pretrial Conference Statements (Due 10 days before conference)	Nov. 6, 2009	February 12, 2010
Deadline for parties to contact Court's ADR Program (15 days after the date of this Order)	Feb. 12, 2009	November 23, 2009

19 Dated: October 28, 2009

20 GCA LAW PARTNERS LLP

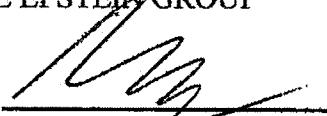
21 By: 

22 James L. Jacobs
Barbara E. Tanzillo

23
24 Attorneys for Defendants
25 NAVEEN CHANANA, SANJEEV TYAGI
26 AND GAURAV GAUBA
27
28

1 Dated: October 28, 2009

THE EPSTEIN GROUP

2 By: 

3 Mark Epstein
4 Julia M. Adams
5 Jessica L. Chylik

6 Attorneys for Plaintiff
7 JAMES WARD

8 **ORDER**

9 PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED ABOVE.

10 No further extension will be granted since the parties have had well over a year to
11 complete their discovery.

12 Dated: November 12, 2009

13 
14 JAMES WARE
15 United States District Judge