

1 ARTHUR J. CASEY, ESQ. (Bar No. 123273)
 2 CARRIE M. DUPIC, ESQ. (Bar No. 240252)
 3 ROBINSON & WOOD, INC.
 227 North First Street
 4 San Jose, CA 95113-1016
 Telephone: 408/298-7120
 Facsimile: 408/298-0477
 Attorneys for Defendant
 5 TECHNIFAB PRODUCTS, INC.

e-filed 12/18/08

6 MARK HASSLER, ESQ.
 7 HUNT, HASSLER & LORENZ, LLP
 100 Cherry Street
 Post Office Box 1527
 8 Terre Haute, IN 47808
 Attorneys for TECHNIFAB PRODUCTS, INC.
 9 *Admitted Pro Hace Vice*

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN JOSE DIVISION

16 CRYOTECH INTERNATIONAL, INC., a
 Delaware Corporation, fka VBS
 17 INDUSTRIES INCORPORATED
 18 Plaintiff,
 19 vs.
 20 TECHNIFAB PRODUCTS, INC., an Indiana
 Corporation; and DOES 1-50 inclusive
 21 Defendants.
 22

Case No. C08 02921 HRL
 Complaint filed: June 12, 2008

**STIPULATION AND REQUEST FOR
 ORDER EXTENDING DEADLINE FOR
 DATES OUTLINED IN CASE
 MANAGEMENT SCHEDULING ORDER
AS AMENDED BY THE COURT**

23 The parties exchanged initial written discovery which led to several telephone calls to
 24 meet and confer as to how best to exchange information necessary to evaluate the case and
 25 maintain confidentiality of proprietary information. In the course of that discussion the parties
 26 determined and agreed upon that an early mediation of the case was indeed possible and perhaps
 27 more practical than extended discovery and then mediation. After further discussion, the parties
 28 agreed that if the Court would agree to extend the deadlines for discovery cut off and expert

1 disclosure, the parties would elect Court Mediation and work with the Court appointed mediator
2 to establish a protocol for exchange of documents and information and to conduct a meaningful
3 mediation.

4 If the Court approves, the parties would propose the following amended schedule:

EVENT:	EXISTING DATE:	PROPOSED DATE:
5 Fact Discovery Cutoff	January 16, 2009	March 6, 2009
6 Designation of Experts with Reports	January 30, 2009	March 20, 2009
7 Designation of Rebuttal Experts with Reports	February 15, 2009	April 6, 2009
8 Expert Discovery Cutoff	March 20, 2009	May 8, 2009
9 Last day for Hearings on Dispositive Motions	April 21, 2009 at 10:00 a.m.	June 9, 2009 at 10:00 a.m.
10 Final Pre-Trial Conference	May 19, 2008 at 1:30 p.m.	July 14 2009
11 Bench Trial	May 26, 2009	July 27 , 2009

12 IT IS HEREBY STIPULATED:

13 Dated: December____,2008

14 ROBINSON & WOOD, INC.

15 By: _____ /S/

16 ARTHUR J. CASEY
17 Attorneys for Defendant
18 TECHNIFAB PRODUCTS, INC.

19 Dated: December____,2008

20 HUNT, HASSLER & LORENZ, LLP

21 By: _____ /S/

22 MARK HASSLER
23 Attorneys for Defendant
24 TECHNIFAB PRODUCTS, INC.

