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11 *Attorneys for Defendant S.C. Johnson & Son, Inc.*

12
 13 **IN THE UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN JOSE DIVISION**

16 WAYNE KOH, on behalf of himself and all
 others similarly situated

17 Plaintiff,

18 vs.

19 S.C. JOHNSON & SON, INC.,

20 Defendant.

Case No.: 09-cv-00927 RMW

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 23 **STIPULATION AND ORDER**
 24 **ESTABLISHING DISCOVERY AND BRIEFING SCHEDULE**

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28 Pursuant to Local Rule 6-1(b), Plaintiff Wayne Koh and Defendant SC Johnson & Son, Inc.
 (collectively, the "Parties"), by their attorneys, hereby stipulate to the following schedule. The
 Parties also hereby respectfully request that the Court order the stipulated schedule:

Stipulation and Order Establishing
 Discovery and Briefing Schedule

Case No. 09-cv-00927 RMW

STIPULATION

WHEREAS, on February 2, 2010, the Court entered the following schedule (Dkt. 50);

Discovery cut-off:	July 8, 2010
Disclosure of experts:	August 6, 2010
Expert discovery cut-off:	September 10, 2010
Pretrial Conference:	November 4, 2010 at 2:00 p.m.
Jury Trial:	December 6, 2010 at 1:30 p.m.
Last Day to Hear Dispositive Motions:	October 1, 2010 at 9:00 a.m.

WHEREAS, though the Parties have been engaging diligently in discovery, they realize that they need additional time to complete discovery;

WHEREAS, the Parties agree that additional time is needed for purposes of conducting briefing on class certification and dispositive motions than that allowed by the current schedule;

WHEREAS, the Parties have, to date, requested a single sixty (60) day extension of the discovery deadline and trial date, which was granted by the Court on February 2, 2010;

WHEREAS, the Parties estimate that they need an additional one hundred and twenty (120) days to complete discovery and conduct briefing on class certification and summary judgment;

THE FOLLOWING SCHEDULE, UPON PERMISSION OF THE COURT, IS AGREED TO BY THE PARTIES:

Class Certification Briefing:

Plaintiff’s motion for class certification:	August 2, 2010
Defendant’s response to motion for class certification:	September 16, 2010
Plaintiff’s reply in support of motion for class certification:	October 14, 2010

Discovery:

Fact discovery cut-off:	October 12, 2010
Plaintiff’s expert reports due:	October 19, 2010
Depositions of plaintiff’s experts:	November 2, 2010

1 Defendant's expert reports due: November 16, 2010
 2 Depositions of defendant's experts: December 3, 2010
 3 **Summary Judgment Briefing:**
 4 Motions for summary judgment: November 19, 2010
 5 Responses to motions for summary judgment: December 20, 2010
 6 Replies in support of motions for summary judgment: January 19, 2011
 7 Last Day to Hear Dispositive Motions: February 4, 2011, at 9:00 a.m.
 8 **Trial:**
 9 Pretrial Conference: March 10, 2011 at 2:00 p.m.
 10 Jury Trial: April 4, 2011 at 1:30 p.m.

11 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

12 DATED: May 18, 2010

REESE RICHMAN LLP

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 6/23/10



Ronald M. Whyte
United States District Judge

