

\*E-Filed 12/15/10\*

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

13 PRAVIN JAIN, RANDY HOLTHAUS, DILIP  
 KUKREJA, MARK WARNER, and DOUGLAS  
 14 TANNER,

15 Plaintiffs,

16 vs.

17 WIPRO, INC., a Delaware corporation, and  
 18 DOES 1 THROUGH 100,

19 Defendants.

Case No.: 5:09-cv-02743-RS

**[PROPOSED] ORDER RE  
 STIPULATION TO MODIFY CASE  
 SCHEDULE**

Case No. 5:09-CV-02743 RS

~~Proposed~~ Order Re Stipulation To Modify Case Schedule

1 Plaintiffs Pravin Jain, Randy Holthaus, Dilip Kukreja, Mark Warner, and Douglas Tanner  
2 (collectively "Plaintiffs") and Defendant Wipro, Inc. ("Wipro") agree as follows:

3 The parties have been working diligently to complete discovery before the current January  
4 12, 2011 deadline for non-expert discovery set forth in the modified Case Management Scheduling  
5 Order, entered on September 10, 2010 ("Scheduling Order") (Docket No. 33). This discovery  
6 includes depositions of several key witnesses located in India.

7 The parties agreed to take the depositions of the India-based witnesses during the week of  
8 January 10, 2011, but two of the witnesses, Suresh Vaswani and Suresh Senapaty, subsequently  
9 became unavailable for that week.

10 To accommodate the witnesses' schedules and leave sufficient time for trial preparation,  
11 the parties agreed to continue the pre-trial and trial dates if the parties would commit to make its  
12 witnesses, including Mr. Vaswani and Mr. Senapaty, available during the week of February 7,  
13 2011.

14 Consequently, IT IS HEREBY STIPULATED between Plaintiffs and Wipro, through their  
15 respective counsel of record, and pursuant to Civil Local Rule 6-2, that, to the extent allowed by  
16 the Court's calendar, the dates set forth in the Scheduling Order be modified as follows:

17	Close of Non-Expert Discovery	February 28, 2011
18	Plaintiffs' Expert Disclosures	March 7, 2011
19	Defendant's Expert Disclosures	March 18, 2011
20	Further Case Management Conference	March 24, 2011 @ 10:00 a.m.
21	Close of Expert Discovery	April 4, 2011
22	Meet and Confer re Pretrial Conference	April 7, 2011
23	Pretrial Motions Heard No Later Than	April 18, 2011
24	Submit Pretrial Statements	April 18, 2011
25	Final Pre-Trial Conference	April 28, 2011 @ 10:00 a.m.
26	Jury Trial Begins	May 2, 2011

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IT IS SO STIPULATED.

Dated: December 14, 2010

SUSMAN GODFREY LLP

By: /s/ Stephen E. Morrissey

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*Attorneys for Plaintiffs*

Dated: December 14, 2010

MICHAEL J. IOANNOU  
DANIEL P. MCKINNON  
ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Michael J. Ioannou (with permission)  
Michael J. Ioannou  
*Attorneys for Defendant Wipro, Inc.*

I, Stephen E. Morrissey, am the ECF user whose identification and password are being used to file this [proposed] order re stipulation to modify case schedule. In compliance with General Order 45.X.B, I hereby attest that the other signatory has concurred in this filing.

Dated: December 14, 2010

SUSMAN GODFREY L.L.P.

By: /s/ Stephen E. Morrissey  
STEPHEN E. MORRISSEY  
Attorneys for Plaintiffs Pravin Jain, Randy Holthaus,  
Dilip Kukreja, Mark Warner, And Douglas Tanner


**PROPOSED ORDER**

Pursuant to stipulation, IT IS HEREBY ORDERED, that the dates set forth in the modified Case Management Scheduling Order, entered on September 10, 2010 (“Scheduling Order”) (Docket No. 33) be modified as follows:

Close of Non-Expert Discovery	February 28, 2011
Plaintiffs’ Expert Disclosures	March 7, 2011
Defendant’s Expert Disclosures	March 18, 2011
Further Case Management Conference	March 24, 2011 @ 10:00 a.m.
Close of Expert Discovery	April 4, 2011
Meet and Confer re Pretrial Conference	April 7, 2011
<del>Dispositive</del> Pretrial Motions Heard No Later Than	<del>April 18, 2011</del> April 7, 2011
Submit Pretrial Statements	April 18, 2011
Final Pre-Trial Conference	April 28, 2011 @ 10:00 a.m.
Jury Trial Begins	<del>May 2, 2011</del> May 9, 2011 @ 10:00 a.m.

IT IS FURTHER ORDERED that the parties make their India-based witnesses, Sanjeesh Gupta, Deepak Chandran, Bipin Paracha, Krishnan Subramanian, Neeraj Jaitley, Dilip Kukreja, Rhagavendran Swaminathan, Suresh Vaswani, Indroneel Dutt, and Suresh Senapaty, available for deposition the week of February 7, 2011.

Dated: 12/14/10, 2010

By:   
Honorable Richard Seeborg  
UNITED STATES DISTRICT JUDGE