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9 Attorneys for Plaintiffs and the Putative Class
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 11 (Additional Counsel Listed on Signature Page)

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

14 GUIFU LI, MENG YANG, FANG DAI,
 LIN CUI, and ZHONG YU on behalf of
 15 themselves and all others similarly situated,
 16 Plaintiffs,
 vs.
 17 A PERFECT DAY FRANCHISE, INC., a
 18 California corporation, *et al.*,
 19 Defendants.

Case No. CV 10-01189 LHK (PSG)

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~ ORDER TO
 CONTINUE DEADLINE FOR EXPERT
 DISCLOSURES** As Modified

21 MINJIAN HAND HEALING INSTITUTE,
 INC., a California corporation,
 22 Counterclaimant,
 vs.
 23 FANG DAI, and individual; ZHONG YU, an
 24 individual; LIN CUI, and individual; and
 25 DOES 11-30, inclusive,
 26 Counterdefendants.

Courtroom: 4, 5th Floor
 Judge: Hon. Lucy H. Koh

Complaint Filed: March 22, 2010

1 WHEREAS on June 17, 2011, this Court issued a Minute Order and Case Management Order
2 (Dkt. 203) which set the deadline for expert discovery as follows:

- 3 • Disclosures September 15, 2011
- 4 • Rebuttal Disclosures October 6, 2011
- 5 • Expert Discovery Cut-Off December 2, 2011

6 WHEREAS the parties have been actively engaged in discovery. Plaintiffs have served
7 document requests and interrogatory requests on Defendants. Defendants have provided responses
8 to those requests. Plaintiffs believe many of the responses are inadequate. In addition, Plaintiffs
9 have served 30(b)(6) deposition notices on A Perfect Day Franchise, Inc. and Minjian Hand Healing
10 Institute, Inc. The depositions have gone forward, but Plaintiffs believe issues remain and the
11 depositions are not yet complete and must be completed.

12 Similarly, Defendants have served document requests and interrogatory requests on
13 Plaintiffs. Plaintiffs have produced responses to those requests. However, Defendants believe many
14 of the responses are inadequate. The parties are meeting and conferring on these discovery issues
15 per the Court's orders and the federal rules, however they may require motions to compel.

16 WHEREAS the parties are currently briefing the Motion for Class Certification and therefore
17 there has not been a decision on class certification, which may affect the parties' use of expert
18 witnesses at trial.

19 WHEREAS there has been no decision on the Defendants' pending Motion to Disqualify
20 Plaintiffs' Counsel which will affect the case moving forward.

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1 IT IS HEREBY STIPULATED by and between the parties, through their respective attorneys
2 of record, that the deadline for expert discovery shall be amended as follows:

- 3 • Disclosures October 21, 2011
- 4 • Rebuttal Disclosures November 15, 2011
- 5 • Expert Discovery Cut-Off December 2, 2011

6 Dated: September 12, 2011

LAW OFFICES OF ADAM WANG

7 DUCKWORTH PETERS LEBOWITZ OLIVIER LLP

8 THE STURDEVANT LAW FIRM
9 A Professional Corporation

10 By: /s/ Monique Olivier
11 Monique Olivier

12 Attorneys for Plaintiffs and the Putative Class and
Counterdefendants

13 Dated: September 12, 2011

LAW OFFICES OF RICHARD WAHNG

14 By: /s/ Lee E. Sheldon
15 Lee Edwin Sheldon
Attorneys for Defendants and Counterclaimant

16 **ADDITIONAL COUNSEL FOR PLAINTIFFS/COUNTERDEFENDANTS**

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21 **ATTESTATION UNDER GENERAL ORDER 45**

22 I, Monique Olivier, am the ECF user whose ID and password are being used to file this
23 STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE FOR EXPERT
24 DISCLOSURES. In compliance with General Order 45, I hereby attest that Lee Sheldon, counsel
25 for Defendants, has concurred in this filing.

26 DATE: September 12, 2011

27 /s/ Monique Olivier
Monique Olivier

