

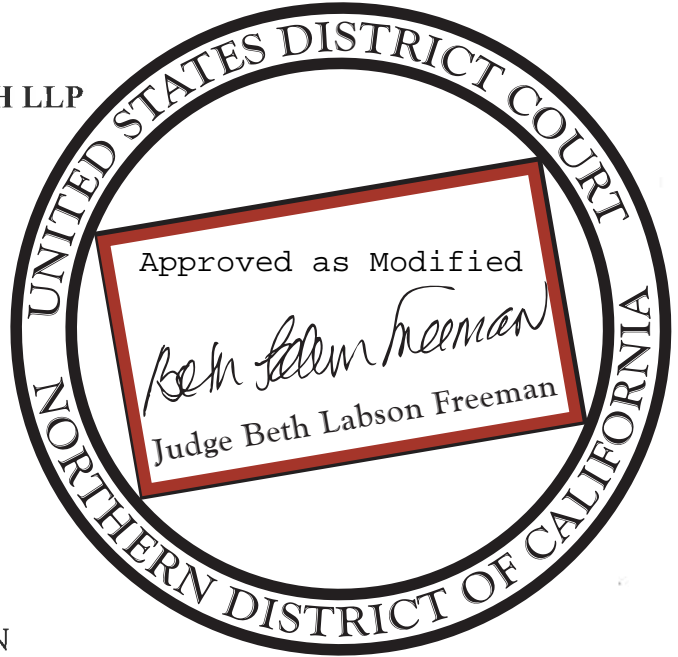
1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 John Barber, SBN 160317
 2 Email: John.Barber@lewisbrisbois.com
 650 Town Center Drive, Suite 1400
 3 Costa Mesa, California 92626
 Telephone: 714.545.9200
 4 Facsimile: 714.850.1030

5 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 Joseph R. Lordan, SBN 265610
 6 Email: Joseph.Lordan@lewisbribois.com
 Marcus J. Lee, SB# 281886
 7 Email: Marcus.Lee@lewisbribois.com
 333 Bush Street, Suite 1100
 8 San Francisco, California 94104
 Tel: 415.362.2580
 9 Fax: 415.434.0882

10 Attorneys for Defendant, SECTEK INC.

11 **FRANK P. SARRO** SBN 129780
 2121 N. California Blvd., Suite 290
 12 Walnut Creek, CA 94596
 Tel: 415.816.5141

13 Attorney for Plaintiff, ELIZABETH GILSON



14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

16 ELIZABETH GILSON,
 17
 18 Plaintiff,
 19
 20 v.
 21 SECTEK, INC., and DOES 1 through 200,
 inclusive,
 22
 23 Defendants.

Case No. 5:15-cv-04772-BLF

JOINT DISCOVERY SCHEDULE

Judge: Hon. Beth L. Freeman
 Date: March 11, 2016

24 Plaintiff Elizabeth Gilson (“Plaintiff”), by and through her counsel of record, Frank P. Sarro,
 25 Esq., and Defendant Sectek, Inc. (“Defendant”), by and through its counsel of record, John Barber,
 26 Esq., Joseph R. Lordan, Esq. and Marcus J. Lee, Esq. of Lewis Brisbois Bisgaard & Smith LLP,
 27 hereby submit their Joint Discovery Schedule pursuant to the Court’s February 22, 2016 Case
 28 Management Order.

1 I. **DISCOVERY SCHEDULE**

2 The parties propose the following scheduling for the Court's review and approval:

3 Last Day to Amend Pleadings or Add Parties: ~~08/04/2017~~ December 15, 2016
4 Fact Discovery Cut-off: 08/04/2017
5 Last Day to Disclose Experts: 08/11/2017
6 Expert Discovery Cut-off: 09/07/2017
7 Last Day to Hear Dispositive Motions: 06/08/2017 (set by the Court)
8 Final Pretrial Conference: 09/07/2017 (set by the Court)
9 Jury Trial: 09/25/2017 (set by the Court)

10 II. **DEPOSITIONS**

11 The parties intend to take the following depositions prior to the mediation deadline of June 30,
12 2016:

13 **For Plaintiff**

14 Michael Harris

15 Rhett Weddell

16 **For Defendant**

17 Plaintiff Elizabeth Gilson

18 The parties intend to take the above depositions between May 2 – May 13, 2016.

19 DATED: March 11, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

21 By: /s/ Marcus J. Lee

22 John L. Barber

23 Joseph R. Lordan

Marcus J. Lee

Attorneys for Defendant SECTEK, INC.

24 DATED: March 11, 2016

26 By: /s/ Frank P. Sarro

27 Frank P. Sarro

28 Attorney for Plaintiff ELIZABETH GILSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FEDERAL COURT CERTIFICATE OF SERVICE

Gilson v. SecTek, Inc., et al.

USDC-ND, San Jose Division Case No. 5:15-cv-04772-BLF

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to the action. My business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On March 11, 2016, I served the following document(s): **JOINT DISCOVERY SCHEDULE**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Frank P. Sarro, Esq. 2121 North California Boulevard, Suite 290 Walnut Creek, CA 94596 <i>Attorney for Plaintiff Elizabeth Gilson</i>	Tel: 415.816.5141 Fax: Email: fpsarro@hotmail.com
------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------

The documents were served by the following means:

- (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above (excluding those not registered for CM/ECF who were served by mail, if applicable.)

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on March 11, 2016, at San Francisco, California.

/s/ Berenice Barragan
Berenice Barragan