1

2

3

4

5

6

7

8

9

10

11

12

13

15

17

19

21

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

HALO ELECTRONICS, INC., Plaintiff,

v.

PULSE ELECTRONICS, INC. and PULSE ELECTRONICS CORP.,

Defendants.

2:07-cv-00331-PMP (PAL)

JOINT MOTION TO EXTEND THE **DEADLINE TO FILE THE PROPOSED** PRE-TRIAL ORDER AND [PROPOSED] **ORDER**

The parties, Halo Electronics, Inc., Pulse Electronics, Inc., and Pulse Electronics Corp., jointly move for a short extension to the deadline for submitting the pre-trial order currently set by the Court.

14 The current deadline for the parties to submit the proposed pre-trial order is November 29, 2011. (Doc. No. 301.) The parties jointly request that the Court extend that deadline to December 23, 2011. There are multiple reasons the parties seek an extension. First, Magistrate Judge Leen 16 has permitted the parties to file supplemental expert reports on November 17, 2011 and December 18 1, 2011 to address various legal and factual developments since the initial reports were exchanged in Fall 2010. (Doc. No. 303.) These supplemental reports may impact the issues of law and fact 20 included in the proposed Pre-Trial Order, as well as the parties' exhibit lists, which must also be included in the Pre-Trial Order. It would thus be efficient to reset the deadline for the Pre-Trial 22 Order to a date that is a reasonable time after the last supplemental expert reports are due. Second, 23 the proposed extension will not impact either side's availability for trial or the agreed upon trial dates submitted to the Court in the pre-trial order. 24

25 Therefore, the parties respectfully submit that there is good cause to grant this motion and extend the deadline for filing the proposed Pre-Trial Order to December 23, 2011. 26

27 28

Dated: November 17, 2011	KILPATRICK TOWNSEND & STOCKTON LLP
	By: <u>/s/ Kristopher L. Reed</u> David E. Sipiora, <i>Pro Hac Vice</i>
	Kristopher L. Reed, <i>Pro Hac Vice</i> 1400 Wewatta Street, Suite 600
	Denver, CO 80202
	Telephone: (303) 571-4000 Facsimile: (303) 571-4321
	Attorneys for Defendants Pulse
	Engineering, Inc. and Technitrol, Inc.
Deted. Nevember 17 2011	
Dated. November 17, 2011	FISH & RICHARDSON P.C.
	By: /s/ Michael J. Kane John C. Adkisson (adkisson@fr.com)
	Michael J. Kane (kane@fr.com) William R. Woodford (woodford@fr.com)
	3200 RBC Plaza
	60 South Sixth Street Minneapolis, MN 55402
	Telephone: (612) 335-5070 Facsimile: (612) 288-9696
	Attorneys for Plaintiff
	Halo Electronics, Inc.
IT IS SO ORDERED:	
	\frown \frown
Dated: _November 17, 2011	Chip M. On
	The Honorable Philip M. Pro United States District Judge
	č

1	CERTIFICATE OF SERVICE	
1 2	I certify that on November 17, 2011, I caused a true and correct copy of JOINT MOTION	
2	TO EXTEND THE DEADLINE TO FILE THE PROPOSED PRE-TRIAL ORDER AND [PROPOSED] ORDER to be served electronically via the Court's CM/ECF system on the	
4	following:	
5	William R. Woodford	
6	Michael J. Kane John C. Adkisson	
7	Fish & Richardson P.C. 60 South Sixth Street	
8	Suite 3300	
9	Minneapolis, MN 55402 woodford@fr.com	
10	kane@fr.com adkisson@fr.com	
10	Juanita R. Brooks	
11	Fish & Richardson P.C.	
	12390 El Camino Real San Diego, CA 92130	
13	brooks@fr.com	
14	Kelly A. Evans	
15	Paul Swenson Prior Snell & Wilmer LLP	
16	3883 Howard Hughes Parkway Suite 1100	
17	Las Vegas, NV 89169	
18	kevans@swlaw.com sprior@swlaw.com	
19	Attorneys for Defendants Pulse Engineering, Inc. and Technitrol, Inc.	
20		
21		
22		
23	/s/ Susan Stenen	
24	Susan Stenen	
25		
26		
27		
28		