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HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL PRODUCTS INC.,
Plaintiff,
v.
ARKON RESOURCES, INC.,
Defendant.

CONSOLIDATED CASE

Lead Case No. 2:15-cv-01984-JLR

**STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR REVISED DISCOVERY
SCHEDULE**

NOTE ON MOTION CALENDAR:
March 1, 2018

NATIONAL PRODUCTS INC.,
Plaintiff,
v.
HIGH GEAR SPECIALTIES INC.,
Defendant.

Case No. 2:15-cv-01985-JLR

JURY TRIAL DEMANDED

NATIONAL PRODUCTS INC.,
Plaintiff,
v.
WIRELESS ACCESSORY SOLUTIONS,
LLC, d/b/a IBOLT – WIRELESS
ACCESSORY SOLUTIONS, LLC,
Defendant.

Case No. 2:15-cv-02024-JLR

JURY TRIAL DEMANDED

STIP. MTN. FOR REVISED
DISCOVERY SCHEDULE
Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

FENWICK & WEST LLP
1191 SECOND AVENUE, 10TH FLOOR
SEATTLE, WASHINGTON 98101
TELEPHONE 206.389.4510
FACSIMILE 206.389.4511

1 NATIONAL PRODUCTS INC.,

Case No. 2:16-cv-00109-JLR

2 Plaintiff,

3 v.

4 BRACKETRON, INC.

JURY TRIAL DEMANDED

5 Defendant.

6
 7 Pursuant to the Court's October 23, 2017 Order for Revised Schedule (Dkt. No. 105),
 8 plaintiff National Products Inc. ("NPI") and defendants Arkon Resources, Inc. ("Arkon"), High
 9 Gear Specialties Inc. ("High Gear"), Wireless Accessory Solutions, LLC, d/b/a IBOLT –
 10 Wireless Accessory Solutions, LLC ("IBOLT"), and Bracketron, Inc. ("Bracketron")
 11 (collectively, "Defendants") jointly submit the following revised proposed schedule to govern
 12 the above-captioned matters.

13 The parties ask that the Court enter the following schedule of deadlines:

Event	Current Schedule (Dkt. No. 105)	Parties' Proposal
Noting date for all motions related to discovery, pursuant to LCR 7(d)(3) or LCR 37(a)(2)	March 29, 2018	May 11, 2018
Discovery Completion	April 6, 2018	May 18, 2018

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 21 Good cause exists to modify the current schedule. Under the current schedule, the
 22 deadline to complete depositions and all other remaining discovery is in just over five weeks, on
 23 April 6, 2018. Coordination of counsel and witness schedules, particularly for the multiple
 24 expert witness depositions, has been made extremely difficult by trial and other extended
 25 obligations of counsel. Accordingly, due to the condensed schedule and the parties' scheduling
 26

1 conflicts in the upcoming weeks, the parties believe that good cause exists to modify the current
2 schedule as provided above.

3 Dated: March 1, 2018

Respectfully submitted,

6 By: s/Jessica M. Kaempf

David K. Tellekson, WSBA No. 33523
Ewa M. Davison, WSBA No. 39524
Jonathan T. McMichael, WSBA No. 49895
Jessica M. Kaempf, WSBA No. 51666
FENWICK & WEST LLP
1191 Second Avenue, 10th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Facsimile: 206.389.4511
Email: dtellekson@fenwick.com
edavison@fenwick.com
jmcmichael@fenwick.com
jkaempf@fenwick.com

13 *Attorney for Plaintiff*
14 *National Products Inc.*

27
28 STIP. MTN. FOR REVISED
DISCOVERY SCHEDULE
Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

1 Dated: March 1, 2018

Respectfully submitted,

2 By: s/James E. Breitenbucher

3 James E. Breitenbucher, WSBA No. 27670
4 FOX ROTHSCHILD LLP
5 1001 Fourth Avenue, Suite 4500
6 Seattle, WA 98154-1192
7 Tel: 206.624.3600
8 Fax: 206.389.1708
9 Email: jbreitenbucher@foxrothschild.com

10 Marc A. Karish (admitted *pro hac vice*)
11 KARISH & BJORGUM, PC
12 119 E. Union Street, Suite B
13 Pasadena, CA 91103
14 Tel: 213.785.8070
15 Fax: 213.995.5010
16 Email: marc.karish@kb-ip.com

17 *Attorneys for Defendants Arkon Resources,*
18 *Inc.; Wireless Accessory Solutions, LLC, d/b/a*
19 *iBolt – Wireless Accessory Solutions, LLC; and*
20 *High Gear Specialties, Inc.*

21 Dated: March 1, 2018

Respectfully submitted,

22 By: s/Robert J. Carlson

23 Robert J. Carlson, WSBA No. 18455
24 LEE & HAYES PLLC
25 One Convention Place
26 701 Pike Street, Ste. 1600
27 Seattle, WA 98101
28 Tel: 206.315.4001
Fax: 206.315.4004
Email: bob@leehayes.com

Terrance C. Newby (admitted *pro hac vice*)
MASLON LLP
Wells Fargo Center
90 South Seventh St., Ste. 3300
Minneapolis, MN 55402
Tel: 612.672.8328
Fax: 612.672.8328
Email: terry.newby@maslon.com

Attorneys for Defendant
Bracketron, Inc.

29 STIP. MTN. FOR REVISED
30 DISCOVERY SCHEDULE
31 Case Nos. 2:15-cv-01984-JLR,
32 2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
33 2:16-cv-00109-JLR

ORDER

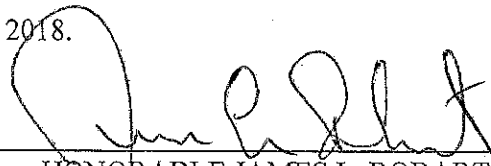
This matter is before the Court on the parties' Stipulated Motion for Revised Schedule. The Court, having considered this matter and the record in this case, ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Noting date for all motions related to discovery, pursuant to LCR 7(d)(3) or LCR 37(a)(2)	May 11, 2018
Discovery Completion	May 18, 2018

SO ORDERED this 1st day of March, 2018.



HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

1 Presented by:

2
3 By: s/Jessica M. Kaempf

4 David K. Tellekson, WSBA No. 33523
5 Ewa M. Davison, WSBA No. 39524
6 Jonathan T. McMichael, WSBA No. 49895
7 Jessica M. Kaempf, WSBA No. 51666
8 FENWICK & WEST LLP
9 1191 Second Avenue, 10th Floor
Seattle, WA 98101
Tel: 206.389.4510
Fax: 206.389.4511
Email: dtellekson@fenwick.com
edavison@fenwick.com
jmc michael@fenwick.com
jkaempf@fenwick.com

10 *Attorneys for Plaintiff National Products Inc.*

11
12 By: s/James E. Breitenbucher

13 James E. Breitenbucher, WSBA No. 27670
14 FOX ROTHSCHILD LLP
15 1001 Fourth Avenue, Suite 4500
16 Seattle, WA 98154-1065
Tel: 206.624.3600
Fax: 206.389.1708
Email: jbreitenbucher@foxrothschild.com

17 Marc A. Karish (admitted *pro hac vice*)
18 KARISH & BJORGUM, PC
19 119 E. Union Street, Suite B
20 Pasadena, CA 91103
Tel: 213.785.8070
Fax: 213.995.5010
Email: marc.karish@kb-ip.com

21 *Attorneys for Defendant Arkon Resources, Inc.*
22 *Attorneys for Defendants Arkon Resources, Inc.;*
23 *Wireless Accessory Solutions, LLC, d/b/a iBolt –*
24 *Wireless Accessory Solutions, LLC; and*
25 *High Gear Specialties Inc.*

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By: s/Robert J. Carlson
Robert J. Carlson, WSBA No. 18455
LEE & HAYES PLLC
One Convention Place
701 Pike Street, Ste. 1600
Seattle, WA 98101
Tel: 206.315.4001
Fax: 206.315.4004
Email: bob@leehayes.com

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MASLON LLP
Wells Fargo Center
90 South Seventh St., Ste. 3300
Minneapolis, MN 55402
Tel: 612.672.8328
Fax: 612.672.8328
Email: terry.newby@maslon.com

*Attorneys for Defendant
Bracketron, Inc.*

28 STIP. MTN. FOR REVISED
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FACSIMILE 206.389.4511

CERTIFICATE OF SERVICE

I, Kathy Meyer, hereby certify that on March 1, 2018, I caused the foregoing
STIPULATED MOTION AND [PROPOSED] ORDER FOR REVISED DISCOVERY
SCHEDULE to be served on the following parties as indicated below:

<p>James E. Breitenbucher (WSBA No. 27670) FOX ROTHSCHILD LLP 1001 Fourth Avenue, Suite 4500 Seattle, WA 98154-1065</p> <p><i>Attorneys for Defendants Arkon Resources, Inc.;</i> <i>Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p> <p><i>Attorneys for Defendant High Gear Specialties Inc.</i></p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email jbreitenbucher@foxrothschild.com</p>
<p>Marc A. Karish (admitted <i>pro hac vice</i>) KARISH & BJORGUM, PC 119 E. Union Street, Suite B Pasadena, CA 91103</p> <p><i>Attorneys for Defendants Arkon Resources, Inc.;</i> <i>Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p> <p><i>Attorneys for Defendant High Gear Specialties Inc.</i></p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email marc.karish@kb-ip.com</p>
<p>Robert J. Carlson (WSBA No. 18455) LEE & HAYES PLLC One Convention Place 701 Pike Street, Ste. 1600 Seattle, WA 98101</p> <p><i>Attorneys for Defendant Bracketron, Inc.</i></p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email [by agreement of counsel] bob@leehayes.com</p>

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<p>Terrance C. Newby (admitted <i>pro hac vice</i>) E. Casey Beckett (admitted <i>pro hac vice</i>) MASLON LLP Wells Fargo Center 90 South Seventh St., Ste. 3300 Minneapolis, MN 55402 Attorneys for Defendant Bracketron, Inc.</p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email [by, agreement of counsel] terry.newby@maslon.com casey.beckett@maslon.com</p>
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Dated: March 1, 2018

By: s/Kathy Meyer
For Jessica M. Kaempf, WSBA No. 51666
FENWICK & WEST LLP

STP. MTN. FOR REVISED
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