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	Attorneys for Plaintiff	TELA INNOVATIONS, INC.
19	INTEL CORPORATION	[Additional counsel listed on signature page]
20	11/122 0014 0141101	
20		
21		
	UNITED STATES DISTRICT COURT	
22	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
22	Z (
23	INTEL CORPORATION,) CASE NO. 18-cv-02848-WHO
24	DI : .: CC	
- '	Plaintiff,) STIPULATION AND [PROPOSED]) ORDER TO EXTEND TIME FOR
25	V.	DEPOSITION PURSUANT TO DKT.
2.	· ·) NO. 199
26	TELA INNOVATIONS, INC.,)
27) Judge: Hon. William H. Orrick
- '	Defendant.	_)
28		

Under the Court's Order on Discovery Disputes (Dkt. No. 199), Intel must produce a witness who can testify about Tela's Interrogatory No. 27 by March 18, 2020. Intel identified Mr. Keith Gray on February 25, 2020 to testify pursuant to that Order and to provide testimony about certain additional license agreements produced by Intel after the close of discovery as a compromise to a discovery dispute. The deposition was scheduled to take place on March 18, 2020. Tela disagrees that Mr. Gray, who has no first-hand knowledge of the topic, is sufficient to comply with the Court's Order. Intel's position is that Mr. Gray is sufficiently knowledgeable about Interrogatory No. 27 and that its production of Mr. Gray fully complies with the Court's Order. Tela will seek the Court's assistance to order Intel to produce one or more witnesses with direct knowledge of the topic described in the Court's Order on Discovery Disputes ("Other Depositions").

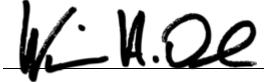
Due to the recent escalation of travel restrictions, social distancing and health concerns related to COVID-19, the parties agree that some accommodations are warranted to the deadline for Intel to comply with the Order on Discovery (Dkt. 199) and the deadlines for opening and rebuttal expert reports (Dkt. 77). Thus, the parties stipulate to postpone the March 18, 2020 deadline for conducting the deposition pursuant to the Court's Order on Discovery Disputes (Dkt. 199). The parties are monitoring the situation relating to the outbreak of the disease, and will reschedule the deposition for a future date.

The parties further stipulate that the deadline to provide opening expert reports will be extended from March 25, 2020 to April 8, 2020, and rebuttal expert reports extended from April 24, 2020 to May 8, 2020. The parties further stipulate that a limited supplementation of opening expert reports by Tela will be allowed, limited to information addressed in Mr. Gray's deposition and limited to information about the additional license agreements for which Mr. Gray will provide testimony that is not evident from the face of those agreements, and will be due 7 days after Mr. Gray's deposition. Limited supplemental rebuttal expert reports, limited to the issues raised in the supplemental opening expert reports, will be due 7 days after service of the supplemental opening expert reports, or the deadline for rebuttal expert reports, whichever is later. The parties have not reached agreement on a procedure to provide further limited supplementation if the Court orders Other Depositions. The parties will address that issue in their joint discovery letter.

1	The parties have not previously sought extensions of any of the above deadlines and no other		
2	dates in the calendar are affected by this requested change.		
3	IT IS SO STIPULATED, through Counsel of R	ecord.	
4	DATED: March 16, 2020		
5		Respectfully submitted,	
6	By: /s/ Todd M. Friedman	By: /s/ Gregory S. Bishop	
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27		TELA INNOVATIONS, INC.	

IT IS ORDERED that the forgoing Agreement is approved.

Dated:March 18, 2020



Honorable William H. Orrick

UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document bas been obtained from the other signatories.

Respectfully submitted,

By: /s/ Todd M. Friedman

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