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11 Attorneys for Plaintiff
AGENCY SOLUTIONS.COM, LLC d.b.a.
12 HEALTHCONNECT SYSTEMS

13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA
15 FRESNO DIVISION

16
17 AGENCY SOLUTIONS.COM, LLC d.b.a.
HEALTHCONNECT SYSTEMS,
18 Plaintiff,
19
20 v.
21 THE TRIZETTO GROUP, INC.,
22 Defendant,

Civil Action No. 11-cv-01014-AWI-GSA

**STIPULATION AND [PROPOSED]
ORDER TO STAY DISTRICT
COURT PROCEEDINGS PENDING
RESOLUTION OF PLAINTIFF'S
APPEAL OF THIS COURT'S ORDER
ON MOTION FOR PRELIMINARY
INJUNCTION**

Judge: Hon. Anthony W. Ishii, Court 2

1 WHEREAS, on September 13, 2011, this Court entered an Order denying Plaintiff
2 Agency Solutions.com, LLC d.b.a. HealthConnect Systems (HCS)'s Motion for Preliminary
3 Injunction (Dkt.# 61, Memorandum Opinion and Order on Plaintiff's Motion for Preliminary
4 Injunction, herein "Order on PI Motion");

5 WHEREAS, on October 11, 2011, HCS filed a Notice of Appeal appealing to the Ninth
6 Circuit the Order on PI Motion (Dkt.# 65);

7 WHEREAS, HCS and Defendant The TriZetto Group, Inc. (TZG), agree that it is
8 appropriate to stay proceedings in this Court pending resolution of HCS's appeal of the Order on
9 PI Motion – provided that the dates set forth in the current Scheduling Order (Dkt.# 64) are
10 adjusted to take into account the duration of such stay;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED BY THE UNDERSIGNED THAT:

12 1. All proceedings in this action in this Court are stayed, effective immediately,
13 pending resolution of HCS's appeal of the Order on PI Motion; specifically, the stay will
14 remain in effect until the Ninth Circuit issues its Mandate on HCS's appeal of the Order
15 on PI Motion.

16 2. The dates set forth in the current Scheduling Order will be extended, upon
17 resolution of the appeal, by approximately the same number of days that this stay remains
18 in effect.

19 3. The parties shall file a joint report setting forth a new proposed schedule for this
20 action within 14 days after the Ninth Circuit issues its Mandate on the appeal.

21
22 **IT IS SO STIPULATED**

23 Dated: October 13, 2011.

MANATT, PHELPS & PHILLIPS, LLP

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25 By: /s/ Ronald S. Katz
Ronald S. Katz

26 *Attorneys for Plaintiff Agency Solutions.com,*
27 *LLC d.b.a. HealthConnect Systems*

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Dated: October 13, 2011.

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

By: /s/ Brian M. Daucher (as authorized on 10/13/11)
BRIAN M. DAUCHER

Attorneys for Defendant
THE TRIZETTO GROUP, INC.

ORDER

IT IS SO ORDERED.

Dated: October 14, 2011



CHIEF UNITED STATES DISTRICT JUDGE