

1 CHRISTIAN J. MARTINEZ (State Bar No. 215360)
 2 2500 Dean Leshar Drive, Suite A
 3 Concord, CA 94520
 4 Telephone: (925) 689-1200
 5 Facsimile: (925) 689-1263
 6 cmartinez@copypro.com
 7 Attorney for Plaintiff
 8 Wordtech Systems, Inc.

9 BOUTIN JONES INC.
 10 Michael E. Chase, SBN 214506
 11 Kevin C. Davis, SBN 253425
 12 555 Capitol Mall, Suite 1500
 13 Sacramento, CA 95814
 14 Tel.: (916) 321-4444
 15 Fax: (916) 441-7597
 16 Attorneys for Defendants Hamid Assadian and
 17 Integrated Network Solutions Corp.

18 **UNITED STATES DISTRICT COURT**
 19 **EASTERN DISTRICT OF CALIFORNIA**

20 WORDTECH SYSTEMS, INC., a California)
 21 corporation,)
 22)
 23 Plaintiff,)
 24)
 25 v.)
 26)
 27 INTEGRATED NETWORK SOLUTIONS,)
 28 INC., a Nevada corporation, dba INTEGRATED)
 NETWORK SOLUTIONS, CORP. aka)
 INTEGRATED NETWORK SOLUTIONS aka)
 INTEGRATED SYSTEMS aka)
 INTERNETNETWORK STORAGE)
 COMPANY aka INSC; NASSER KHATEMI,)
 an individual; HAMID ASSADIAN, an)
 individual; EHTERAM GHODSIAN, an)
 individual; SHOREH JAVADI, an individual;)
 MICHAEL E. ELLSWORTH, an individual;)
 BRIAN J. DEAN, an individual; SAN JUAN)
 UNIFIED SCHOOL DISTRICT; and DOES 1-)
 50,)
)
 Defendants.)

Case No. **2:04-cv-01971-MCE-EFB**
STIPULATION TO VACATE
COURT’S JUNE 14, 2010 ORDER;
ORDER

Courtroom: 7
District Judge: Morrison C. England, Jr.
Mag. Judge: Edmund F. Brennan

///

1 Plaintiff Wordtech Systems, Inc. and Defendants Hamid Assadian and Integrated Network
2 Solutions Corp. (collectively, “Parties”), through their below-signed counsel, hereby stipulate as
3 follows:

4 1. On June 14, 2010, this Court issued an Order (Docket #398). The Order, among other
5 things, required assignment to Wordtech Systems, Inc. of various rights associated with Hamid
6 Assadian’s beneficial interest in MAA Investments, LLC. The June 14, 2010 Order was premised
7 upon the Amended Judgment which was entered against Hamid Assadian by this Court on April
8 13, 2009 (Docket # 274).

9 2. Defendants Hamid Assadian, Nasser Khatemi, and Integrated Network Solutions, Corp.
10 appealed this Court’s April 13, 2009 Judgment to the United States Court of Appeals for the
11 Federal Circuit (“Court of Appeals”). On June 16, 2010, the Court of Appeals issued a decision
12 and judgment that, among other things, reversed this Court’s denial of Defendants’ motion for new
13 trial on Hamid Assadian’s individual liability for direct infringement, inducement, and
14 contributory infringement. The Court of Appeals further reversed the denial of Defendants’
15 motion for new trial on damages and remanded for further proceedings.

16 3. Pursuant to Federal Rule of Appellate Procedure 41, the Court of Appeals must issue its
17 mandate after the time to petition for rehearing expires.

18 4. The Parties stipulated to this Court staying the above referenced June 14, 2010 Order pending
19 issuance of mandate by the Court of Appeals. The Court of Appeals issued mandate on September
20 29, 2010.

21 5. Wordtech Systems, Inc. does not object to this Court vacating the above referenced June 14,
22 2010 Order.

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 6. The Parties stipulate and agree that this Court's June 14, 2010 Order be vacated.

2 IT IS SO AGREED:

3

4 Date: October 8, 2010

5

By: /s/ Christian Martinez authorized on October 8, 2010
Christian Martinez
Attorney for Plaintiff Wordtech Systems, Inc.

6

7

8 Date: October 8, 2010

BOUTIN JONES INC.

9

10

By: /s/ Michael E. Chase
Michael E. Chase
Attorneys for Defendants Hamid Assadian and
Integrated Network Solutions Corp.

11

12

13

14

ORDER

15


IT IS SO ORDERED. For good cause, this Court's June 14, 2010 Order is vacated.

16

17

Dated: October 19, 2010

18


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE

19

20

21

22

23

24

25

26

27

28