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7 Attorneys for Defendants  
8 SKYLUX INC., MUJEEB PUZHAKKARAILLATH,  
9 and SKYLUX TELELINK PVT LTD

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

12 MOHIT RANDHAWA aka HARPAL  
13 SINGH and SHANNON CALLNET PVT  
14 LTD,

15 Plaintiff,

16 v.

17 SKYLUX INC., INTERACTIVE  
18 INTELLIGENCE, INC., MUJEEB  
19 PUZHAKKARAILLATH, SKYLUX  
20 TELELINK PVT LTD and DOES 1  
21 through 20, inclusive,

22 Defendants.

Case No. 2:09-CV-02304-WBS-DAD  
*Hon. William B. Shubb*

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE  
FOR DEFENDANTS' RESPONSES  
TO THE FOURTH AMENDED  
COMPLAINT**

[Proposed Order Lodged]

Date: No Hearing Set  
Time:  
Ctrm: 5

23 Plaintiffs Mohit Randhawa and Shannon Callnet Pvt Ltd. (together,  
24 "Plaintiffs") and Defendants Skylux Inc., Skylux Telelink Pvt Ltd., and Mujeeb  
25 Puzhakkarailath (together, the "Skylux Defendants") hereby submit the following  
26 Stipulation, and for good cause request the Court's approval thereof:

27 WHEREAS:

- 28 1. This action was commenced in state court on May 27, 2009, and was  
removed to this Court on August 20, 2009.

- 1 2. Plaintiffs filed a Fourth Amended Complaint on August 10, 2010. (Docket  
2 No. 86).
- 3 3. On September 5, 2010, Plaintiffs filed a motion to stay the entire action  
4 pending arbitration between Plaintiff Shannon Callnet and Defendant  
5 Interactive Intelligence, Inc. (Docket No. 88.)
- 6 4. On September 8 and 9, 2010, defendants filed motions to dismiss the Fourth  
7 Amended Complaint. (Docket Nos. 90, 91.)
- 8 5. On October 12, 2010, the Court heard oral argument on the motions to  
9 dismiss, as well as on Plaintiffs' motion to stay the action. (Docket No.  
10 101.)
- 11 6. On October 18, 2010, the Court granted Plaintiffs' motion to stay the entire  
12 action pending completion of arbitration. (Docket No. 102.) As to the  
13 claims against the Skylux Defendants, the Court found that the "arbitrable  
14 claims against Interactive and non-arbitrable claims against the Skylux  
15 defendants sufficiently overlap in law and fact to suggest that the rest of the  
16 claims should be stayed." The Court then stated that it "will grant  
17 Shannon's Callnet's motion to stay the claims against the Skylux defendants  
18 and thus deny the Skylux defendants' motion to dismiss." (*Id.* at 7:13-27.)
- 19 7. On December 9, 2011, the Court ruled: "As it appears that the action will be  
20 in arbitration for the foreseeable future, this case shall be ordered  
21 administratively closed." (Docket No. 123 at 2:18-20.) The Court stayed all  
22 proceedings. (*Id.* at 2:27-28.)
- 23 8. On July 12, 2012, Interactive moved to vacate the stay and confirm its  
24 arbitration award against Plaintiff Shannon Callnet. (Docket No. 124.)
- 25 9. On August 3, 2012, the Court ordered the stay be lifted. (Docket No. 131.)  
26 The Court further set for a Status Conference for September 4, 2012 "to  
27 address the remaining claims against the Skylux defendants."  
28

1 10. The remaining parties (Plaintiffs and the Skylux Defendants) have submitted  
2 a Joint Status Report seeking the Court's clarification of the procedural  
3 status of this case.

4 11. Plaintiffs are willing to extend the deadline for the Skylux Defendants to  
5 respond to the Fourth Amended Complaint to September 24, 2012, to allow  
6 time for the Court to issue the requested clarification.

7 NOW THEREFORE, the parties, through their counsel of record herein, now  
8 STIPULATE AND AGREE to the following:

9 The time within which Defendants shall respond to the Fourth  
10 Amended Complaint shall be extended to September 24, 2012.

12 Dated: August 10, 2012 BUSINESS LEGAL PARTNERS

14 By: /s/ Gregg A. Rapoport  
15 Gregg A. Rapoport

16 Attorneys for Defendants  
17 SKYLUX INC., MUJEEB  
18 PUZHAKKARAILLATH, and  
SKYLUX TELELINK PVT LTD

19 Dated: August 10, 2012 THE LAW OFFICE OF JAY IAN  
20 ABOUDI

21 By: /s/ Jay Ian Aboudi  
22 Jay Ian Aboudi

23 Attorney for Plaintiffs  
24 MOHIT RANDHAWA aka HARPAL  
25 SINGH and SHANNON CALLNET PVT  
LTD

26 **ORDER**

27 Based on the stipulation entered by the parties, IT IS ORDERED  
28 THAT the deadline for the Skylux Defendants to respond to the Fourth Amended

1 Complaint shall be September 24, 2012.

2 IT IS SO ORDERED.

3  
4 DATED: August 10, 2012

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6 WILLIAM B. SHUBB  
7 UNITED STATES DISTRICT JUDGE

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**PROOF OF SERVICE**

I, the undersigned, declare:

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action. My business address is: 135 W. Green St., Suite 100, Pasadena, California 91105 (the "firm").

Upon my oath, I hereby state that the foregoing

**STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR DEFENDANTS' RESPONSES TO THE FOURTH AMENDED COMPLAINT**

is being filed electronically, and notice hereof will automatically be sent to all counsel of record that participate in electronic filing, by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. In addition, if any attorneys are not participating in electronic filing, they are identified below and have been mailed, via first-class postage, notice hereof on the date this document is being electronically filed.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed on **August 10, 2012**, at Pasadena, California.

By: /s/ Gregg A. Rapoport  
Gregg A. Rapoport