

1 PAUL D. TRIPODI II, State Bar No. 162380
WILSON SONSINI GOODRICH & ROSATI
 2 Professional Corporation
 633 West Fifth Street
 3 Suite 1550
 Los Angeles, CA 90071
 4 Telephone: (323) 210-2900
 Facsimile: (866) 974-7329
 5 Email: ptripodi@wsgr.com

6 Attorneys for Defendants
ZIPMARK, INC. and JAY BHATTACHARYA

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9

10	MYECHECK, INC. a California Corporation,)	CASE NO.: 14-CV-2399-JAM-KJN
11)	
12	Plaintiff,)	JOINT STIPULATION EXTENDING
13)	THE TIME TO ANSWER
14	v.)	
15	ZIPMARK, INC., JAY BHATTACHARYA, and)	Judge: Hon. John A. Mendez
16	Does 1 – 20, Inclusive,)	
17)	
18	Defendants.)	
19)	
20)	
21)	
22)	
23)	
24)	
25)	
26)	
27)	
28)	

1 Pursuant to L.R. 143 and L.R. 144, the parties jointly submit this Stipulation.

2 WHEREAS, on October 10, 2014, plaintiff MyECheck, Inc. (“Plaintiff”) filed the above-
3 captioned complaint against Zipmark, Inc. and Jay Bhattacharya (collectively “Defendants”)
4 (ECF No.1);

5 WHEREAS, Plaintiff did not serve a copy of the Complaint on Defendants, but
6 Defendants subsequently agreed to waive service pursuant to Fed. R. Civ. P. 4(d);

7 WHEREAS, on December 23, 2014, the parties submitted a joint stipulation waiving
8 service and setting a date of January 8, 2015 for Defendants to answer, move, or otherwise
9 respond to the Complaint (ECF No. 5);

10 WHEREAS, on January 8, 2015, Defendants moved to dismiss the Complaint in its
11 entirety (ECF No. 6);

12 WHEREAS, on March 17, 2015, the Court granted in part and denied in part Defendants’
13 motion to dismiss the Complaint, and, *inter alia*, dismissed all claims against Defendant Jay
14 Bhattacharya (ECF No. 19);

15 WHEREAS, Defendant Zipmark, Inc. (“Zipmark”) has not yet filed an Answer to the
16 Complaint;

17 WHEREAS, Zipmark’s Answer is presently due March 31, 2015;

18 WHEREAS, the parties would like to have additional time to engage in settlement
19 discussions prior to Zipmark’s Answer being filed;

20 It is hereby STIPULATED AND AGREED by and between the undersigned counsel for
21 the parties that Zipmark’s time to further respond to the Complaint shall be extended by thirty
22 (30) days, and Zipmark’s Answer shall be due no later than April 30, 2015.

23
24
25
26
27
28

1 Dated: March 27, 2015

2

By: /s/ Brian R. Katz
Brian R. Katz

3

4

Attorney for Plaintiff
MyECheck, Inc.

5

6

7 Dated: March 27, 2015

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

8

9

By: /s/ Paul D. Tripodi, II
Paul D. Tripodi, II

10

11

Attorneys for Defendants
Zipmark, Inc. and Jay Bhattacharya

12

13

14

15 Dated: March 30, 2015

IT IS SO ORDERED

16

/s/ John A. Mendez
Honorable Judge John A. Mendez

17

18

19

20

21

22

23

24

25

26

27

28