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6 Attorneys for Defendants and Counterclaimants,  
 7 VALENTUS, INC. and DAVID JORDAN

8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

11 ADVANCED LABORATORIES  
 12 INTERNATIONAL, LLC,  
 13 Plaintiff,  
 14 v.  
 15 VALENTUS INTERNATIONAL; DAVE  
 JORDAN, and DOES 1-20, inclusive,  
 16 Defendants.

19 VALENTUS, INC. and DAVID JORDAN;  
 20 Counterclaimants,  
 21 v.  
 22 ADVANCED LABORATORY  
 23 INTERNATIONAL, LLC; VITAE  
 GLOBAL, LLC; and LOUIS VOLPE;  
 24 Counterdefendants.  
 25

Case No. 2:17-cv-00141-TLN-CMK

**STIPULATION AND ORDER  
 CONTINUING HEARING DATE ON  
 MOTIONS TO COMPEL AND  
 APPLICATION FOR ORDER TO  
 SHOW CAUSE**

Hearing Date: January 10, 2018  
 Hearing Time: 10:00 a.m.  
 Courtroom: 304, 3rd Floor  
 Judge: Hon. Craig M. Kellison

1 Defendant and Counterclaimant Valentus, Inc. (“Valentus”), on the one hand, and Plaintiff and  
2 Counter-Defendant Advanced Laboratory International, LLC, and Counter-Defendants Vitae Global,  
3 LLC and Louis Volpe (collectively, the “Counter-Defendants”) on the other hand, hereby stipulate and  
4 agree as follows:

5 1. Valentus has filed three separate motions to compel as against the Counter-Defendants  
6 (Dkt. Nos. 24, 25, and 29) (the “Motions”).

7 2. On November 28, 2017, to allow the parties to further meet and confer regarding the  
8 Motions, the Court issued an Order continuing the hearing date on the Motions to January 10, 2018,  
9 and continuing the due date for filing a Joint Statement to January 3, 2018. (Dkt. No. 35).

10 3. On December 13, 2017, Valentus filed notice of its Application for Order to Show  
11 Cause why Jane G. Lee should not be held in contempt for failing to comply with a document  
12 subpoena (the “Application”). (Dkt. No. 38). The hearing on the Application is also scheduled for  
13 January 10, 2018.

14 4. The parties have since engaged in settlement discussions and believe they are close to  
15 resolving this matter. To allow the parties to further discuss settlement, and to afford sufficient time to  
16 prepare a settlement agreement, they request a three-week continuance of the foregoing dates. The  
17 parties therefore request that the Court continue the hearing date on the Motions and Application to  
18 January 24, 2018, and the due date for filing the Joint Statement and briefing on the Application to  
19 January 17, 2018.

20 5. Good cause exists to grant this request, to avoid potentially unnecessary time and  
21 expense, and the need for the Court to resolve the Motions.

22 Dated: January 3, 2018

Respectfully submitted,

23 COAST LAW GROUP, LLP

24 /s/ Ross M. Campbell

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**ORDER**

Pursuant to the stipulation between the parties, IT IS HEREBY ORDERED that:

1. Valentus, Inc.'s motions to compel (Docs. 24, 25, and 29) (the "Motions"), and its application for order to show cause why Jane G. Lee should not be held in contempt for failing to comply with a document subpoena (Doc. No. 38) (the "Application"), currently set for hearing on January 10, 2018, are reset for hearing in Redding, California, on January 24, 2018, at 10:00 a.m.; the parties may appear telephonically at the hearing; and

2. The parties shall file a single joint statement regarding all three Motions on or before January 17, 2018. Briefing on the Application shall also be due on or before January 17, 2018.

Dated: January 8, 2018

  
**CRAIG M. KELLISON**  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 3, 2018, I caused the foregoing document to be electronically served upon counsel for Plaintiff and Counter-Defendants via ECF, as follows:

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Dated: January 3, 2018

/s/ Ross M. Campbell  
*Attorneys for Defendants and Counterclaimants*