

1 Defendant, Sean Hu, hereby moves the Court for an Order extending the deadline to file
2 and serve an opposition and reply to Plaintiff's Motion to Dismiss and Motion to Strike First
3 Amended Counterclaims ("Motion") until May 24, 2018 and May 31, 2018, respectively. Plaintiff,
4 CSPC Dophen Corporation ("CSPC"), stipulates to the relief requested in this motion. In support of
5 the relief requested Defendant states:

6 1. CSPC filed a Motion to Dismiss and Motion to Strike First Amended Counterclaims
7 on April 16, 2018, which was scheduled to be heard on May 17, 2018.

8 2. On the Court's own motion, the May 17, 2018 hearing and Motion were vacated
9 and submitted without appearance and argument.

10 3. The Court further stated that the opposition and reply due dates shall be filed in
11 accordance with the original motion hearing date. Such opposition is required to be filed on May
12 3, 2018.

13 4. The Defendant, Sean Hu, desires to terminate his relationship with his counsel of
14 record, Krogh & Decker, LLP, and further desires to move forward in pro per and oppose the
15 Motion on his own.

16 5. Upon learning of Dr. Hu's desire to oppose the Motion himself, on April 26, 2018,
17 counsel for Dr. Hu reached out to Plaintiff's counsel requesting an agreement to extend certain
18 upcoming deadlines.

19 6. On April 27, 2018, counsel for Plaintiff agreed to the requested extensions.

20 5. Defendant contends that fairness and judicial economy will be served by extending
21 the deadline to file and serve an opposition and reply in order to provide Dr. Hu with sufficient
22 time to respond to the Motion.

23 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
24 attorneys of record as follows:

25 1. The date on or before which Defendant Sean Hu shall file an opposition to the
26 Motion is hereby extended to May 24, 2018.



