

1 I. NEEL CHATTERJEE (SBN 173985)
 NChatterjee@goodwinlaw.com
 2 MICHAEL T. JONES (SBN 661336)
 mjones@goodwinlaw.com
 3 GOODWIN PROCTER LLP
 135 Commonwealth Drive
 4 Menlo Park, California 94025-1105
 Tel.: +1 650 752 3100
 5 Fax.: +1 650 853 1038

6 Attorneys for Defendant
 7 INDIAN ISITUTE OF
 TEHCNOLOGY, KHARAGPUR

8 [ADDITIONAL COUNSEL LISTED
 9 ON SIGNATURE PAGE]

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13
 14 MANDANA D FARHANG, et al.,
 15 Plaintiff,
 16 v.
 17 INDIAN INSTITUTE OF TECHNOLOGY
 KHARAGPUR, et al.,
 18 Defendant.

Civil Action No. 3:08-cv-02658-WHO

**STIPULATION AND ORDER
 REQUESTING RESCHEDULING
 OF CASE MANAGEMENT
 CONFERENCE AND ORDER**

Date: April 11, 2017
 Time: 2:00 p.m.
 Judge: Honorable William H. Orrick

20
 21
 22
 23
 24
 25
 26
 27
 28

1 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1(b) and 6-2, Defendants
2 INDIAN INSTITUTE OF TECHNOLOGY KHARAGPUR (“IIT”), through their undersigned
3 counsel, hereby file the following request to postpone the Case Management Conference scheduled
4 for April 11, 2017 at 2:00 p.m. for twenty four (24) days until May 5, 2017 at 2:00 p.m., or the
5 Court’s earliest available date thereafter. In support of this request, the Defendants submit as
6 follows:

7 WHEREAS, on March 23, 2017, the Court issued an order scheduling a case management
8 conference for April 11, 2017 at 2:00 p.m. (Dkt. 508);

9 WHEREAS, in February 2017, Defendant’s counsel changed law firms and is currently
10 seeking to obtain the files from the case from the previous firm. Defendant requires additional time
11 to prepare for the Case Management Conference in order to adequately review and transfer all
12 records that exist in the case, as well as to meet and confer on Case Management issues. An
13 additional twenty four (24) days should permit sufficient time for the parties to attend to these
14 matters;

15 WHEREAS, on February 22, 2017, Defendant filed a change of counsel, and therefore
16 believes rescheduling the case management conference is appropriate. Defendant requires additional
17 time to prepare for the Case Management Conference in order to adequately review all records that
18 exist in the case. This will permit Defendant to meaningfully participate in the Case Management
19 Conference. The parties require additional time for counsel to meet and confer to prepare a joint case
20 management statement;

21 WHEREAS, counsel for Defendant is unavailable during the currently scheduled case
22 management conference date of April 11, 2017;

23 WHEREAS, rescheduling this Case Management Conference will allow both parties
24 additional time to meaningfully meet and confer regarding case management issues and Plaintiffs’
25 counsel has indicated they are not opposed to the rescheduling of the Case Management Conference
26 or to an extension of time for submission of a joint case management statement;

27 WHEREAS, no Party will be prejudiced by the relief requested in the stipulation and there
28 will be no changes to the case schedule in existence prior to the entry of this stipulation; and

1 WHEREAS, all Parties' claims and defenses are expressly preserved and not waived by
2 entering into this stipulation.

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between the Parties
4 and Defendant respectfully moves the Court that the Case Management Conference shall be moved
5 from April 11, 2017 at 2:00 p.m. to May 5, 2017 at 2:00 p.m., or the soonest date thereafter that the
6 Court is available, and that the date for the submission of the joint case management statement will
7 be moved from April 4, 2017 to April 28, 2017.

8
9 Respectfully submitted,

10 By their attorneys,

11 Dated: March 29, 2017

/s/ I. Neel Chatterjee

I. Neel Chatterjee (SBN 173985)
NChatterjee@goodwinlaw.com
Michael T. Jones (SBN 661336)
mjones@goodwinlaw.com
GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025-1105
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

17 Attorneys for Defendant
18 INDIAN ISITUTE OF
TEHCNOLOGY, KHARAGPUR

19 Respectfully submitted,

20 By their attorneys,

21 Dated: March 29, 2017

/s/ Sanjiv N. Singh

Sanjiv N. Singh (SBN 193525)
ssingh@sanjivnsingh.com
SANJIV N. SINGH,
A PROFESSIONAL LAW CORP.
21 Columbus Avenue, Suite 205
San Francisco, CA 94111
Tel.: +1 415 296-0152
Fax.: +1 415 358-4006

27 Micah R. Jacobs (SBN 174630)
mjacobs@jacobslawsf.com
28 388 Market Street, Suite 1300

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

San Francisco, CA 94111
Tel.: +1 415 445 4696
Fax.: +1 415 445 4697

Attorneys for Plaintiffs
M.A. MOBILE LTD and
MANDANA D. FARHANG

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference is set for May 9, 2017 at 2:00 p.m.

DATED: April 3, 2017



HONORABLE WILLIAM H. ORRICK
United States District Judge