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Attorneys for Plaintiff Plantronics, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLANTRONICS, INC.,

Plaintiff,

v.

ALIPH, INC. and ALIPHCOM, INC.,

Defendants.

Case No. C 09-01714 BZ

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
MOTIONS TO COMPEL FACT
DISCOVERY**

CIV. L.R. 6-2

1 Pursuant to Civil Local Rule 6-2, Defendants Aliph, Inc. and AliphCom, Inc. and Plaintiff
2 Plantronics, Inc., by and through their counsel, hereby submit the following stipulation and
3 proposed order.

4 WHEREAS, the Court has set the date for the “Fact Discovery Cut-off” to be November
5 23, 2011 (Order, D.N. 91);

6 WHEREAS, pursuant to Civil Local Rule 37-3, motions to compel fact discovery may not
7 be filed more than 7 days after the Fact Discovery Cut-off, except by order of the Court for good
8 cause shown;

9 WHEREAS, in this case, the 7 days between the Fact Discovery Cut-off and the deadline
10 for filing motions to compel included the Thanksgiving holiday;

11 WHEREAS, the parties are actively engaged in meeting and conferring to resolve
12 outstanding discovery issues, and believe that additional time before the deadline for motions to
13 compel will enable them to narrow, if not resolve any such issues;

14 ACCORDINGLY, the parties agree that the deadline for filing a motion to compel should
15 be extended one week to December 7, 2011, and that compliance with the deadline will be met by
16 filing a letter requesting a conference with the Court regarding a fact discovery dispute, pursuant
17 the Court’s Initial Discovery Order.

18 IT IS SO STIPULATED.

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1 Dated: November 29, 2011

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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By: /s/ Gabriel S. Gross

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Gabriel S. Gross

Attorneys for Defendants

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ALIPH, INC. and ALIPHCOM, INC.

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Dated: November 29, 2011

CONFLUENCE LAW PARTNERS

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By: /s/ David Bohrer

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David Bohrer

Attorneys for Plaintiff

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PLANTRONICS, INC.

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1 **PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, IT IS SO**
2 **ORDERED.**

3 DATED: November 30, 2011
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7 Hon. Bernard Zimmerman
8 United States Magistrate Judge
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13 I, Dane Reinstedt, am the ECF User whose identification and password are being used to
14 file this document. Pursuant to General Order 45.X.B, I hereby attest that David Bohrer, counsel
15 for Plaintiff and Gabriel Gross, counsel for Defendant, have concurred in this filing.
16

17 Dated: November 29, 2011

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19 */s/ Dane Reinstedt*
20 Dane Reinstedt
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