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18	Attorneys for Plaintiffs TechCrunch, Inc., et al.		
19		DISTRICT COURT ICT OF CALIFORNIA	
		SCO DIVISION	
20	TECHCRUNCH, INC. a Delaware	CASE NO. 09-cv-5812 RS (PVT)	
21	corporation, and CRUNCHPAD, INC., a Delaware corporation,	STIPULATION AND [XXXXXXXXXXXXXXXX	
22		ORDER GRANTING EXTENSION OF	
23	Plaintiffs,	TIME REGARDING FUSION GARAGE'S PRODUCTION OF REDACTED SOURCE	
24	vs.	CODE	
	FUSION GARAGE PTE. LTD, a Singapore		
25	company,		
26	Defendant.		
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35947.1	STIPULATION AND [PROPOSED] ORDER CASE NO. 09-CV-5812 RS (PVT)		

WHEREAS, on October 6, 2010, the Court ordered Fusion Garage to produce several
 categories of documents including source code documents. (Dkt. 184) (hereinafter "Order"). The
 Court allowed Fusion Garage to redact the actual JooJoo source code while leaving the source
 code comments and metadata;

5 WHEREAS, the Court's Order established a deadline of October 22, 2010 for this
6 production;

7 WHEREAS, the responsive source code documents comprise 10,325 discrete documents
8 and 76,289 individual pages, virtually all of which require manual redactions for each page;

9 WHEREAS, Fusion Garage has been diligently redacting and processing these documents
10 for production, but will require roughly two weeks from the present date to finish this process,
11 given the volume of source code documents and the number of manual redactions at issue;

WHEREAS, Fusion Garage has prepared the other non-source code documents called for
by the Order for production and will produce these documents by October 22, 2010, and will also
respond to Plaintiffs' Interrogatory Nos. 1 and 2 by October 22, 2010;

WHEREAS, counsel for the parties have meet and conferred concerning Fusion Garage's
source code redactions and the need for additional time to comply with the Court's Order;

17 WHEREAS, the following time modifications have been previously made in this case: 18 time to file a responsive pleading (Dkt. No. 16); motion to set the hearing dates on Fusion 19 Garage's motion to dismiss, to strike, and for a more definite statement ("motion to dismiss") and 20 Plaintiffs' motion for a preliminary injunction to May, 6, 2010 (Dkt. No. 45); motion to shorten 21 time to hear Fusion Garage's motion to compel documents to support its opposition to Plaintiffs' 22 Motion for a preliminary injunction (Dkt. No. 55); setting new hearing date on Plaintiffs' motion 23 for a preliminary injunction and defendant's motion to dismiss (Dkt. 64); and granting extension 24 of time regarding briefing on Plaintiffs' motion to compel (Dkt. 178);

NOW, THEREFORE, the parties stipulate and agree that Fusion Garage shall have a twoweek extension, until November 5, 2010, to produce its redacted source code documents to
Plaintiffs. The October 22, 2010 date for Fusion Garage to produce its non-source code

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1	documents and respond to Plaintiffs' Interrogatory Nos. 1 and 2 set forth in the Court's October 6.	
2	2010 Order shall remain unchanged.	
3		
4	IT IS SO STIPULATED.	
5	Dated: October 20, 2010 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
6	SULLIVAN, LLP	
7	By /s/ Thomas R. Watson	
8	Thomas R. Watson	
9	Attorneys for Defendant Fusion Garage PTE., Ltd.	
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11		
12	DATED: October 20, 2010 WINSTON & STRAWN LLP	
13		
14	By /s/ Matthew A. Scherb Matthew A. Scherb	
15	Attorneys for Plaintiffs TechCrunch, Inc. and	
16	CrunchPad, Inc.	
17		
18	Pursuant to stipulation, it is SO ORDERED.	
19	Fursuant to supulation, it is SO OKDERED.	
20	DATED: October 21, 2010	
21		
22	Patricia V. Frumlull	
23	HON. PATRICIA V. TRUMBULL	
24	UNITED STATES MAGISTRATE JUDGE	
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04049.51632/3735947.1	STIPULATION AND [PROPOSED] ORDER 2 CASE NO. 09-CV-5812 RS (PVT)	

1	FILER'S ATTESTATION	
2	Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest that I	
3	have obtained concurrence in the filing of this document from Matthew A. Scherb, counsel for	
4	Plaintiffs.	
5	DATED: October 20, 2010 By: <u>/s/ Thomas R. Watson</u>	
6	DATED: October 20, 2010 By: <u>/s/ Thomas R. Watson</u> Thomas R. Watson	
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04049.51632/3735947.1	STIPULATION AND [PROPOSED] ORDER 3	