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17 Attorneys for Plaintiffs TechCrunch, Inc., et al.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 TECHCRUNCH, INC. a Delaware
 corporation, and CRUNCHPAD, INC., a
 Delaware corporation,

22 Plaintiffs,

23 vs.

24 FUSION GARAGE PTE. LTD, a Singapore
 25 company,

26 Defendant.

CASE NO. 09-cv-5812 RS (PSG)

**JOINT STIPULATION AND [PROPOSED]
 ORDER CONTINUING CASE
 MANAGEMENT CONFERENCE**

1 Pursuant to Local Rule 6-2 and 16-2(e), Plaintiffs TechCrunch, Inc. and CrunchPad, Inc.
2 (collectively, "Plaintiffs"), and Defendant Fusion Garage PTE, Ltd. ("Defendant"), by and through
3 their respective counsel of record, hereby stipulate to continue the Initial Case Management
4 Conference scheduled for March 17, 2011.

5 1. Reason for the Request

6 The Court denied Defendant's Motion to Dismiss the Amended Complaint on February 9,
7 2011 and, at the same time, set an Initial Case Management Conference for March 17, 2011. *See*
8 Dkt. 194. However, lead counsel for Defendant Fusion Garage is currently scheduled to argue
9 motions for summary judgment on March 17, 2011 in the case captioned *Bedrock Computer*
10 *Technologies, LLC v. Soflayer Technologies, Inc. et al.*, 6:09-cv-00269-LED-JDL (E.D. Tex.).

11 As a result, the parties have agreed to request a continuation of the Initial Case Management
12 Conference in this matter until March 31, 2011.

13 The parties will file a Case Management Conference statement and its ADR certifications by
14 March 24, 2011.

15 2. Prior Time Modifications

16 The following time modifications have been previously made in this case: time to file a
17 responsive pleading (Dkt. No. 16); motion to set the hearing dates on Fusion Garage's motion to
18 dismiss, to strike, and for a more definite statement ("motion to dismiss") and Plaintiffs' motion for
19 a preliminary injunction to May, 6, 2010 (Dkt. No. 45); motion to shorten time to hear Fusion
20 Garage's motion to compel documents to support its opposition to Plaintiffs' Motion for a
21 preliminary injunction (Dkt. No. 55); setting new hearing date on Plaintiffs' motion for a
22 preliminary injunction and defendant's motion to dismiss (Dkt. 64); granting extension of time
23 regarding briefing on Plaintiffs' motion to compel (Dkt. 178); and granting a brief extension of time
24 to comply with an order compelling the production of redacted source code (Dkt. 188).

25 3. Effect of Requested Modification

26 The requested modification will have no effect on the rest of the schedule in this action.

27 So Stipulated.

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1 NOW, THEREFORE, the parties to this action, through their respective counsel of record,
2 AGREE AND HEREBY STIPULATE, if agreeable to the Court, to continue the Initial Case
3 Management Conference until March 31, 2011 at 10:00 a.m. The parties will submit a Case
4 Management Conference Statement and their ADR certifications by March 24, 2010.

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6 IT IS SO STIPULATED.

7 Dated: March 9, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Thomas R. Watson

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Thomas R. Watson

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Attorneys for Defendant Fusion Garage PTE., Ltd.

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DATED: March 9, 2011

WINSTON & STRAWN LLP

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By /s/ Matthew A. Scherb

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Matthew A. Scherb

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Attorneys for Plaintiffs TechCrunch, Inc. and
CrunchPad, Inc.

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Pursuant to stipulation, it is SO ORDERED.

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DATED: March 10, 2011

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HON. RICHARD SEEBORG
UNITED STATES DISTRICT COURT JUDGE

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