

E-Filed 12/16/11

1 David S. Bloch (SBN: 184530)
 dbloch@winston.com
 2 J. Caleb Donaldson (SBN: 257271)
 jcdonaldson@winston.com
 3 WINSTON & STRAWN LLP
 101 California Street
 4 San Francisco, CA 94111-5802
 Telephone: (415) 591-1000
 5 Facsimile: (415) 591-1400

6 Attorneys for Plaintiffs

8 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Claude M. Stern (Bar No. 96737)
 9 claudestern@quinnemanuel.com
 Evette Pennypacker (Bar No. 203515)
 10 evettepennypacker@quinnemanuel.com
 Thomas R. Watson (Bar No. 227264)
 11 555 Twin Dolphin Dr., 5th Floor
 Redwood Shores, Ca 94065
 12 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

13 Attorneys for Defendant

Winston & Strawn LLP
 101 California Street
 San Francisco, CA 94111-5802

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**

18	TECHCRUNCH, INC., et al.)	Case No. 3:09-cv-05812 RS (PSG)
19)	
20	Plaintiffs,)	JOINT STIPULATION AND [PROPOSED]
21	vs.)	ORDER CONTINUING DATE WRITTEN
22	FUSION GARAGE PTE. LTD.,)	DISCOVERY RESPONSES ARE DUE
23	Defendant.)	

1 WHEREAS, the parties engaged in private mediation on September 21, 2011, and executed a
2 Memorandum of Understanding regarding final settlement of this case at the mediation;

3 WHEREAS, the parties sought a stay pending the execution of a definitive agreement, which
4 was granted by Judge Richard Seeborg on September 23, 2011 (Dkt. 216);

5 WHEREAS, the parties were unable to reach a final agreement regarding settlement despite
6 lengthy and good faith settlement negotiations (Dkt. 217, 219, 220);

7 WHEREAS, prior to the Court ordered stay, the parties propounded the following sets of
8 written discovery: Defendant's Requests for Production (Set 4), Interrogatories (Set 3), and
9 Requests for Admission (Set 1); and Plaintiffs' Requests For Production (Set 8) and Interrogatories
10 (Set 4) (collectively, "Written Discovery");

11 WHEREAS, the parties had previously stipulated to serve responses to the Written Discovery
12 on December 16, 2011, which was approved by the Court in an order dated November 11, 2011
13 (Dkt. 221, Dkt. 222);

14 WHEREAS, Defendant filed a Motion to Compel Production of Documents on September 9,
15 2011 (Dkt. 212);

16 WHEREAS, in accordance with the parties' stipulated schedule, approved by the Court in an
17 order dated November 11, 2011 (Dkt. 221, Dkt. 222), Plaintiffs filed an Opposition to the Motion to
18 Compel on December 2, 2011 (Dkt. 226);

19 WHEREAS, the Court entered an order scheduling the hearing on the Motion to Compel on
20 January 3, 2012 (Dkt. 224);

21 WHEREAS, Quinn Emanuel Urquhart & Sullivan, LLP filed a motion to withdraw as
22 counsel of record for Fusion Garage on December 13, 2011 ("Quinn Emanuel's Motion") (Dkt.
23 230);

24 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the
25 parties identified below that, subject to Court approval, the December 16, 2011 date to provide
26 responses to the parties' Written Discovery, shall be continued to a date mutually agreeable between
27 the parties in light of Quinn Emanuel's Motion.

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