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 Kos Media and Markos Moulitsas Zúniga

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 KOS MEDIA, LLC and
 MARKOS MOULITSAS ZÚNIGA,

Case No.: C10-02894 MEJ

13
 14 PLAINTIFFS,

) [Assigned for all purposes to
 Hon. Marie –Elena James, Courtroom B,
 15th Floor]

15 VS.

) JOINT STATUS REPORT,
 REQUEST AND STIPULATION
 FOR PROPOSED CONTINUANCE
 OF DATE for CASE
 MANAGEMENT CONFERENCE

16
 17 RESEARCH 2000 AND DELAIR D. ALI,

18 DEFENDANTS.

) Current Hearing Date: Dec. 02, 2010
 Requested Hearing Date: Jan. 17, 2010

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 20 TO THE COURT, ALL THE PARTIES AND THEIR ATTORNEYS OF
 21 RECORD:

22 By and through their undersigned counsel, Plaintiffs Kos Media and Markos
 23 Moulitsas Zúniga (collectively “Plaintiffs”), and Defendants RESEARCH 2000 AND
 24 DELAIR D. ALI (collectively “Defendants”) respectfully submit the following Status
 25 Report, Request and Stipulation for Continuance of the hearing date in the above
 26 captioned matter for the Case Management Conference currently set for Thursday
 27 December 02, 2010.

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1 **STATUS**

2 The parties have reached an agreement as to the contours of a proper settlement
3 but are still in the process of determining whether the execution of the proposed terms
4 is feasible. The parties will know whether execution is feasible within one week.
5 Accordingly, the parties hereby seek through their undersigned counsel a short
6 continuance of the instant case management conference, currently on calendar for
7 Thursday December 02, 2010.

8 In view of the foregoing, IT IS HEREBY STIPULATED and agreed by and
9 between Plaintiffs and Defendants that the instant Case Management Conference shall
10 be continued until January 17, 2011.

11 **GOOD CAUSE**

12 Good cause exists to grant the instant Request and allow the parties additional
13 time to execute the contemplated settlement for the following reasons:

14 1. The parties have negotiated a settlement in good faith and it would be a
15 waste of judicial resources for the Court to intervene at this stage when all that needs
16 to be seen is whether the contemplated settlement is indeed feasible.

17 2. The contemplated settlement would likely result in a final and complete
18 resolution of the instant controversy.

19 3. If the contemplated terms are not feasible, undersigned counsel may be
20 able to reach an alternative arrangement without burdening the Court, and in any
21 event, the most prudent present course is to wait and see whether the contemplated
22 settlement will result in a final and complete resolution of the instant controversy.

23 4. The parties request a hearing date of January 17, 2011 in view of the fact
24 that Plaintiffs' counsel will begin a five day jury trial in Los Angeles on January 03,
25 2010 and in contemplation of the pending holidays in December.

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