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 9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)**

11 Adobe Systems Incorporated, )  
 12 Plaintiff, )  
 v. )  
 13 Renee Norwood, et al. )  
 14 Defendants. )

Case No. CV10-3564 SI  
**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 [PROPOSED] ORDER**  
**Date: December 14, 2010**  
**Time: 2:30 p.m.**  
**Court: Hon. Susan Illston**

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 16 \_\_\_\_\_ )  
 ALL RELATED CLAIMS )  
 17 \_\_\_\_\_ )

18 PLAINTIFF Adobe Systems Incorporated (“Adobe”), by and through its counsel of record,  
 19 and Defendant Renee Norwood (“Norwood”), by and through her counsel of record, hereby  
 20 stipulate and request as follows:

21 WHEREAS Adobe filed its complaint on or about August 13, 2010;  
 22 WHEREAS Norwood was served on or about September 18, 2010;  
 23 WHEREAS Norwood, through her counsel of record, Michael L. Rodenbaugh, of  
 24 Rodenbaugh Law, and Karen J. Bernstein, of the Law Offices of Karen J. Bernstein, admitted *pro*  
 25 *hac vice*, filed an Answer and Counterclaims/Third-Party Complaint on or about November 17,  
 26 2010;  
 27  
 28

1           WHEREAS the Parties have stipulated to extend the time for Adobe and Third-Party  
2 Defendant Software and Information Industry Association (“SIIA”) to file responses to the  
3 Counterclaims/Third-Party Complaint;  
4

5           WHEREAS the Parties conducted a Rule 26 conference on or about November 23, 2010;

6           WHEREAS, at that time, the Parties had not yet agreed upon an ADR selection;

7           WHEREAS Karen J. Bernstein is currently in the process of withdrawing as counsel for  
8 Norwood, and current representation of Norwood remains unclear;

9           WHEREAS the Parties began preparation of the Joint CMC Statement but have not yet  
10 finalized a draft nor agreed upon a selection for ADR due to the ambiguity of Norwood’s  
11 representation;  
12

13           WHEREAS briefly continuing the Case Management Conference and all corresponding  
14 deadlines will provide the Parties with additional time to more fully brief the Court on Adobe and  
15 SIIA’s positions on the Counterclaims as well as allow time for Norwood’s counsel of record to  
16 withdraw and/or substitute representation; and  
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1 NOW, THEREFORE, Adobe respectfully requests the Court continue the Joint Case  
2 to 18  
3 Management Conference for approximately sixty (60) days, ~~or not earlier than~~ February 15, 2011.

4 IT IS SO STIPULATED.

5 DATED: December 7, 2010

J. Andrew Coombs, A Professional Corp.

6 By: /s Nicole L. Drey  
7 J. Andrew Coombs  
8 Nicole L. Drey  
9 Attorneys for Plaintiff Adobe Systems Incorporated

10 DATED: December 7, 2010

Law Offices of Karen J. Bernstein

11 By: /s Karen J. Bernstein  
12 Karen J. Bernstein  
13 Attorneys for Defendant Renee Norwood

14  
15 **[PROPOSED] ORDER**

16 PURSUANT TO REQUEST, IT IS SO ORDERED.

17 DATED: \_\_\_\_\_, 2010

18 

19 \_\_\_\_\_  
20 Susan Illston  
21 UNITED STATES DISTRICT JUDGE