Adobe Systems Incorporated v. Norwood

Doc. 46

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1	WHEREAS Norwood filed her Amended Counterclaims on or about March 18, 2011;		
2	WHEREAS Adobe and the SIIA filed their Motion to Dismiss the Amended Counterclai		
3	("Motion") on or about April 8, 2011;		
4	WHEREAS the Parties stipulate that any delay in filing the Motion has not caused		
5	prejudice to Norwood and that Norwood waives any objections to the timeliness of the Motion, in		
6 7	the event this stipulation is entered by the Court;		
8	WHEREAS the hearing on the Motion is currently set for May 13, 2011;		
9	WHEREAS counsel for Norwood has a familial obligation on May 13, 2011, such that he		
10	cannot attend the hearing;		
	WHEREAS counsel for Norwood is currently preparing a motion to withdraw as counsel		
11	due to Norwood's unresponsiveness and lack of payment;		
12	WHEREAS, if Norwood's current counsel is granted leave to withdraw as counsel,		
13	Norwood will need sufficient time to retain new counsel and/or prepare an opposition to the		
14	Motion;		
15	WHEREAS, alternatively, should counsel's motion to withdraw not be granted, counsel		
16	will need sufficient time to prepare an opposition to the Motion and is not available for hearing		
17 18	prior to July 8, 2011;		
19	WHEREAS the requested continuance will not affect any current Court deadlines; and		
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1	NOW, THEREFORE, Adobe, the SIIA, and Norwood stipulate and request the hearing on Adobe and the SIIA's Motion be continued until July 8, 2011, or a date thereafter acceptable with the Court, with all briefing dates adjusted accordingly.		
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4	IT IS SO STIPULATED:		
5	Dated: April 19, 2011	J. Andrew Coombs, A Professional Corp.	
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7 8		By: <u>/s Nicole L. Drey</u> J. Andrew Coombs	
9		Nicole L. Drey Attorneys for Plaintiff and Counter-Defendant Adobe	
10		Systems Incorporated and Third-Party Defendant Software & Information Industry Association	
11			
12	Dated: April 19, 2011	Rodenbaugh Law	
13		By: <u>/s Michael L. Rodenbaugh</u>	
14		Michael L. Rodenbaugh Attorneys for Defendant and Counter-Claimant Renee	
15		Norwood	
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17	[PROPOSED] ORDER		
18	PURSUANT TO REQUEST, IT IS SO ORDERED.		
19	DATED:4/19/11, 2011		
20		Suran Illion	
21		Hon. Susan Illston	
22		UNITED STATES DISTRICT JUDGE	
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