



1 Plaintiff Adobe Systems Incorporated (“Plaintiff”) and Defendants Katrina Johnson f/k/a  
2 Katrina Snowden, an individual (“Johnson”), and Royal Distribution, Inc. (“RDI”) (collectively  
3 “Defendants”), by and through their respective counsel of record, hereby stipulate and agree as  
4 follows:

5 WHEREAS Plaintiff filed its Complaint against Defendants on or about August 13, 2010;

6 WHEREAS Defendants filed their Motion to Dismiss Katrina Johnson Pursuant to Fed. R.  
7 Civ. P. 12(b)(2) and 28 U.S.C. 1400(a); and to Dismiss Defendants for Improper Venue Under 28  
8 U.S.C. 1391(b); or in the Court’s Discretion, to Transfer Venue Pursuant to 28 U.S.C. § 1404(a)  
9 (“Motion”) on or about October 25, 2010;

10 WHEREAS Defendant Johnson has sworn to her part-time position at Defendant RDI and  
11 lack of managerial or decision-making duties;

12 WHEREAS Defendant Johnson understands that the statements made in her declaration  
13 submitted in connection with Defendants’ Motion are subject to the penalty of perjury;

14 WHEREAS Defendants acknowledge that the Court has personal jurisdiction over  
15 Defendant RDI;

16 WHEREAS Defendants acknowledge that venue is proper in the Northern District of  
17 California over the claims asserted against Defendant RDI;

18 WHEREAS each party will bear its own fees and costs in connection with Plaintiff’s claims  
19 against Defendant Johnson;

20 WHEREAS the Parties stipulate that Defendant RDI shall have until November 29, 2010,  
21 to file an Answer to the Complaint; and

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NOW, THEREFORE, Plaintiff and Defendants stipulate and request the following:

- 1. Defendant Johnson be dismissed from this Action with prejudice.
- 2. Each side shall bear its own costs in relation to Plaintiff's claims against Defendant Johnson.
- 3. Defendants' Motion be withdrawn and the hearing set for December 3, 2010, vacated.
- 4. Defendant RDI shall have until November 29, 2010, to file an Answer to the Complaint.

IT IS SO STIPULATED:

Dated: 11/12, 2010

J. Andrew Coombs, A Professional Corp.  
 By: Nicole L. Drey  
 J. Andrew Coombs  
 Nicole L. Drey  
 Attorneys for Plaintiff Adobe Systems Incorporated

Dated: Nov. 12<sup>th</sup>, 2010

Sheridan Ross PC  
 By: Patricia Ho  
 Robert R. Brunelli  
 Patricia Y. Ho  
 Attorneys for Defendants

**PROPOSED ORDER**

PURSUANT TO REQUEST, IT IS SO ORDERED.

DATED: November 16, 2010

Hon. Samuel Conti  
UNITED STATES DISTRICT COURT

