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16 Attorneys for Defendants  
 GUVERA IP PTY LTD., and  
 17 GUVERA USA INC.

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT  
 20

21 TIM QUIGLEY, an individual, and QAZ  
 MEDIA, LLC, a Washington corporation,

22 Plaintiffs,

23 vs.

24 GUVERA IP PTY LTD., an Australian  
 25 proprietary limited company, and  
 GUVERA USA INC., a Delaware  
 26 company,

27 Defendants.  
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No. 3:10-cv-03569-CRB

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 RELATED DEADLINES**

Complaint Filed: August 13, 2010

1               This Stipulation and [Proposed] Order to Continue Case Management Conference  
2 and Related Deadlines is entered into by and between Plaintiffs TIM QUIGLEY and QAZ  
3 MEDIA, LLC (collectively, “Plaintiffs”), on the one hand, and Defendants Guvera IP PTY  
4 LTD. and Guvera USA INC. (collectively, “Defendants”), on the other hand, by and through  
5 their respective counsel of record. By entering into this Stipulation, Defendants are not making a  
6 general appearance in this action and, if anything, make a special appearance only. Plaintiffs and  
7 Defendants are collectively referred to herein as the “Parties.”

8                               **RECITALS**

9               A.       WHEREAS, the Court has scheduled a Case Management Conference in  
10 this action for December 3, 2010 at 8:30 a.m.;

11              B.       WHEREAS, prior to the Case Management Conference currently  
12 scheduled for December 3, 2010, the Parties are required under applicable Federal and Local  
13 Rules to exchange initial disclosures, file ADR certifications, file a Case Management Statement,  
14 and comply with other guidelines;

15              C.       WHEREAS, Defendants have filed a Motion to Dismiss pursuant to  
16 Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6); or in the Alternative, a Motion to  
17 Transfer Case pursuant to 28 U.S.C. Section 1404(a), which is set for hearing on December 17,  
18 2010 at 10:00 a.m.;

19              D.       WHEREAS, Plaintiffs have filed a Motion for Preliminary Injunction,  
20 which is also set for hearing on December 17, 2010 at 10:00 a.m.; and

21              E.       WHEREAS, in the interest of judicial economy, and so that the Parties may  
22 address the issues presented by the above-referenced motions, including whether personal  
23 jurisdiction may be exercised over the Defendants in California and/or whether the Northern  
24 District of California is the proper venue for this action, the Parties have agreed to seek a brief  
25 continuance of the Case Management Conference and all related deadlines, subject to the Court’s  
26 calendar and availability.

27                      NOW, WHEREFORE, the Parties agree as follows:

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**STIPULATION**

1. The Case Management Conference in this action shall be continued from December 3, 2010 at 8:30 a.m., to January 21, 2011 at 8:30 a.m., subject to the Court's calendar and availability.

2. All deadlines triggered by the Case Management Conference, including, but not limited to, the deadline to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26 and the deadline to file a Case Management Statement, shall be triggered from the new date of the Case Management Conference.

**IT IS SO STIPULATED.**

Dated: November 12, 2010 HARVEY SISKIND LLP

By: /s/ Naomi Jane Gray  
Naomi Jane Gray  
*Attorneys for Plaintiffs*  
TIM QUIGLEY AND QAZ MEDIA LLC

Dated: November 12, 2010 MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Kevin P. Dwight  
Kevin P. Dwight  
*Attorneys for Defendants*  
GUVERA IP PTY LTD., AND GUVERA USA INC.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: November 16, 2010

