

\*E-Filed 2/13/12\*

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19 VERTICAL COMPUTER SYSTEMS, INC.

20 **UNITED STATES DISTRICT COURT**  
21 **NORTHERN DISTRICT OF CALIFORNIA**  
22 **SAN FRANCISCO DIVISION**

23 INTERWOVEN, INC.,

24 Plaintiff,

25 vs.

26 VERTICAL COMPUTER SYSTEMS, INC.,

27 Defendant.

CIVIL CASE No.: 3:10-cv-04645-RS

28 **STIPULATED REQUEST FOR  
CONSOLIDATION OF THE CASE  
MANAGEMENT CONFERENCE WITH THE  
HEARING FOR THE MOTION TO STAY AND  
[PROPOSED] ORDER**

**JURY TRIAL DEMANDED**

WHITE & CASE LLP  
ATTORNEYS AT LAW

1 Pursuant to Civil Local Rules 6-2 and 7-12 of the Northern District of California,  
2 Plaintiff and Counterclaim-Defendant Interwoven, Inc. (“Interwoven”) and Defendant and  
3 Counterclaimant Vertical Computer Systems, Inc. (“Vertical”), by and through their respective  
4 counsel of record, jointly request for an Order Continuing the Case Management Conference  
5 currently scheduled for February 23, 2012 at 10 a.m. to March 1, 2012 at 10 a.m., and a  
6 corresponding extension of time from February 16, 2012 to February 23, 2012 to file the  
7 supplemental joint case management statement.

8 The parties request this short continuance in order to accommodate pre-existing travel  
9 plans of lead counsel for Interwoven, Bijal V. Vakil, and to consolidate the case management  
10 conference with the hearing on Interwoven’s Motion to Stay, scheduled for March 1, 2012. *See*  
11 Dkt No. 86.

12 The Court’s current scheduling order has no deadlines beyond the case management  
13 conference, and thus no additional deadlines will be affected by this request. *See* Dkt. 58. The  
14 parties respectfully request that the Court not construe this request as a waiver to any position  
15 taken with respect to the pending motion for a stay. The Declaration of Bijal V. Vakil, filed  
16 concurrently with this request, provides the information required by Civil L.R. 6-2(a)(1)-(3).

17 The parties’ stipulated request herein is not made for purposes of delay or harassment,  
18 but is based in good faith upon the grounds stated above. For these reasons, the parties  
19 respectfully request an Order from this Court continuing the date for the Case Management  
20 Conference from February 23, 2012 at 10 a.m. to March 1, 2012 at ~~10 a.m.~~ 1:30 p.m.

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Dated: February 10, 2012

Respectfully submitted,

**WHITE & CASE LLP**

By: /s/ Bijal V. Vakil  
BIJAL V. VAKIL

ATTORNEYS FOR PLAINTIFF AND COUNTERCLAIM-  
DEFENDANT INTERWOVEN, INC.

Dated: February 10, 2012

Respectfully submitted,

**NIRO, HALLER & NIRO**

By: /s/ Vasilios D. Dossas  
VASILIOS D. DOSSAS

ATTORNEYS FOR DEFENDANT AND  
COUNTERCLAIMANT VERTICAL COMPUTER  
SYSTEMS, INC.

The Court finds that the Stipulated Request for an Order Consolidating the Case Management Conference with the Hearing on the Motion to Stay is well taken and should be GRANTED.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/13/12



Honorable Richard Seeborg  
United States District Court Judge