

1 David W. Harlan (admitted *pro hac vice*)  
 2 [धारलान@senniger.com](mailto:धारलान@senniger.com)  
 3 Michael J. Hartley (admitted *pro hac vice*)  
 4 [महार्तली@senniger.com](mailto:महार्तली@senniger.com)  
 5 SENNIGER POWERS  
 100 North Broadway, 17th Floor  
 6 Saint Louis, MO 63102  
 Telephone: (314) 345-7000  
 7 Facsimile: (314) 231-4342

8 Andrew Leibnitz (State Bar No. 184723)  
 9 [अलीबनीत्स@fbm.com](mailto:अलीबनीत्स@fbm.com)  
 Farella Braun + Martel LLP  
 235 Montgomery Street, 17th Floor  
 10 San Francisco, CA 94104  
 Telephone: (415) 954-4400  
 11 Facsimile: (415) 954-4480

12 Attorneys for Plaintiff  
 13 Cave Consulting Group, LLC

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 CAVE CONSULTING GROUP, LLC,

18 Plaintiff,

19 vs.

20 INGENIX, INC.,

21 Defendant.

Case No. CV 11 0469 JSW

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING INITIAL CASE  
 MANAGEMENT CONFERENCE**

22 WHEREAS the Initial Case Management Conference in this matter is scheduled for May  
 23 13, 2011 at 1:30 p.m.;

24 WHEREAS the parties have engaged in initial discussions about potentially resolving this  
 25 litigation;

26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

WHEREAS the parties agree that they need approximately an additional thirty days to assess how to proceed with this action;

WHEREAS counsel for Ingenix, Inc., Devan Padmanabhan of Dorsey & Whitney (50 S. Sixth St., Suite 1500, Minneapolis, MN 55402, (612) 340-2600), has not yet appeared in this matter, but agrees to the continuance proposed herein while preserving all rights to answer, move, or otherwise respond to the Complaint once served;

IT IS HEREBY STIPULATED AND AGREED THAT the Initial Case Management Conference in this matter should be continued to June 17, 2011 at 1:30 p.m., or such date thereafter as convenient for the Court, with the case schedule continued accordingly pursuant to the Court's Order Setting Case Management Conference And Requiring Joint Case Management Conference Statement of February 3, 2011.

Dated: April 21, 2011

FARELLA BRAUN + MARTEL LLP

By: /s/ Andrew Leibnitz  
Andrew Leibnitz  
Attorney for Plaintiff  
Cave Consulting Group, LLC

**ORDER**

Pursuant to stipulation and for good cause shown, the Initial Case Management Conference in this matter is continued to 1:30 p.m. on June 17, 2011. All previously set case deadlines are continued accordingly.

Dated: April 21, 2011

  
Hon. Jeffrey S. White  
United States District Court Judge