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18 Attorneys for Defendants  
 19 DoveBid, Inc. and GoIndustry USA, Inc.

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 22 **UNITED STATES DISTRICT COURT**  
 23 **NORTHERN DISTRICT OF CALIFORNIA**  
 24 **(SAN FRANCISCO DIVISION)**

25 **GROLSCHE BIERBROUWERIJ**  
 26 **NEDERLAND, B.V.**, a Foreign Corporation  
 27 based in the Netherlands,

28 Plaintiff,

v.

29 **DOVEBID, INC.**, a Delaware Corporation,  
 30 and **GOINDUSTRY USA, INC.**, a  
 31 Maryland Corporation, and **DOES 1 through**  
 32 **50, inclusive,**

33 Defendants.

Case No. C 11-00763 SC

**STIPULATION TO EXTEND TIME**  
**TO RESPOND TO AMENDED**  
**COMPLAINT**

1 Pursuant to Rule 6-1(a) of the Local Rules of the Northern District of California,  
2 Plaintiff Grolsche Bierbrouwerij Nederland, B.V. ("**Plaintiff**"), and Defendants  
3 DoveBid, Inc. and GoIndustry USA, Inc. (collectively, "**Defendants**"), hereby stipulate  
4 to extend the time for **Defendants** to respond to **Plaintiff's** Amended Complaint in this  
5 action.

6 As the court is aware, **Defendants** filed a Motion to Dismiss **Plaintiff's** Original  
7 Complaint on March 14, 2011 [Dkt. No. 13]. **Plaintiff** subsequently filed an Amended  
8 Complaint on April 4, 2011 [Dkt. No. 19]. In light of **Plaintiff's** Amended Complaint,  
9 the hearing on **Defendants'** original Motion to Dismiss is now moot, and is being taken  
10 off-calendar by virtue of the Notice of Withdrawal of Motion which is being filed  
11 concurrently herewith.

12 The current deadline to respond to **Plaintiff's** Amended Complaint in this matter  
13 is Monday, April 18, 2011. Unfortunately, however, over the past two days Anthony  
14 Capobianco, lead defense counsel for both DoveBid, Inc. and GoIndustry USA, Inc., lost  
15 an officemate and close friend to a sudden stroke and subsequent complications. As a  
16 result, Mr. Capobianco's time during the next several days will be occupied by the  
17 funeral arrangements, assisting his friend's wife and family, grievance, and related  
18 matters. Under the circumstances, the parties have agreed to a brief extension of time for  
19 **Defendants** to respond to the Amended Complaint.

20 THEREFORE, THE PARTIES HEREBY STIPULATE THAT:

- 21 1. **Defendants'** Response to the Amended Complaint is hereby due on May 2,  
22 2011.
- 23 2. The parties further agree that nothing in this stipulation waives, affects,  
24 and/or limits in any way, the parties' rights, claims, arguments,  
25 counterclaims, and/or defenses in law or equity.

26 This Stipulation is not for purpose of delay. The Case Management Conference  
27 remains scheduled for June 10, 2011, and the parties' Rule 26(f) Report and Case  
28

1 Management Conference Statements remain due on June 3, 2011. Those dates should  
2 not be affected by this Stipulation.

3  
4 IT IS SO STIPULATED AND AGREED.

5 Date: April 13, 2011

KRIEG, KELLER, SLOAN, REILLEY &  
ROMAN LLP

8 By:                 /s/                                

9 Christopher T. Holland  
10 Attorneys for Defendants  
DoveBid, Inc. and GoIndustry USA, Inc.

11  
12 Date: April 13, 2011

FARELLA BRAUN & MARTEL LLP

14 By:                 /s/                                

15 Arjun Agarwal  
16 Attorneys for Plaintiff  
Grolsche Bierbrouwerij, Nederland, B.V.



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**PROOF OF SERVICE**  
**GROLSCH V. DOVEBID, ET AL.**  
**CASE NO. C 11-00763 SC**

I, the undersigned, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

I am an employee of KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP and my business address is 555 Montgomery Street, San Francisco, California 94111. I am over the age of eighteen (18) years and not a party to or interested in the within-entitled action.

On April 13, 2011, I caused to be served in the manner indicated below the following documents:

**STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT**

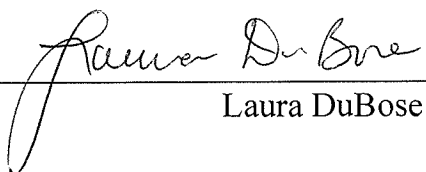
By:

<b>X</b>	<b>MAIL</b> being familiar with the practice of this office for the collection and the processing of correspondence for mailing with the United States Postal Service, and deposited in the United States Mail copies of same to the addresses set forth below, in a sealed envelope, with postage fully prepaid.
	<b>FEDERAL EXPRESS</b> for delivery the following business day by placing same for collection in the nearest Federal Express Deposit Box or Federal Express Office to the business addresses set forth below.

To:

Richard Van Duzer  
Arjun Agarwal  
Farella Braun & Martel LLP  
235 Montgomery Street, 17<sup>th</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 954-4400  
Fax: (415) 954-4480

Executed on April 13, 2011, at San Francisco, California.

  
\_\_\_\_\_  
Laura DuBose