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8 Attorneys for Plaintiffs  
 9 GLOBALNAVSOURCE, INC. and  
 TRAILBEHIND, INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN FRANCISCO DIVISION

13 GLOBALNAVSOURCE, INC., a Florida  
 14 corporation, and TRAILBEHIND, INC., a  
 California corporation,

15 Plaintiffs,

16 v.

17 FOREFLIGHT LLC, a Nevada limited  
 liability company. and DOES 1-50,  
 18 inclusive,

19 Defendants

Case No.: CV11-02918 MEJ

**JOINT STIPULATION AND PROPOSED  
 ORDER TO CONTINUE THE  
 DISCOVERY, BRIEFING, AND HEARING  
 SCHEDULE FOR DEFENDANT  
 FOREFLIGHT LLC'S MOTION TO  
 DISMISS**

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1 In light of the parties' good faith efforts and progress towards settlement of the above-  
2 captioned matter, and pursuant to Civil L.R. 6-12, 7-7(a) and 7-2, and supported by the  
3 attached Declaration of David I. Siegel, Plaintiffs GlobalNavSource, Inc. and TrailBehind, Inc.  
4 (jointly, the "Plaintiffs") and Defendant ForeFlight LLC ("Defendant") respectfully submit  
5 this Joint Stipulation and Proposed Order to Continue Discovery, Briefing, And Hearing  
6 Schedule For Defendant's Motion To Dismiss, and request the Court approve the stipulated  
7 agreement between the parties, as follows (the "Stipulated Order"):

- 8 (1) Plaintiffs shall propound and serve limited jurisdictional discovery to Defendant  
9 (the "Jurisdictional Discovery") no later than September 16, 2011;
- 10 (2) Defendant shall respond to the Jurisdictional Discovery on or before October 17,  
11 2011; Defendant does not waive the right to object to any individual Jurisdictional  
12 Discovery requests or to require that any production of confidential information  
13 will take place pursuant to a mutually acceptable protective order;
- 14 (3) Plaintiffs' opposition to Defendant's Motion to Dismiss pursuant to Fed. R. Civ. P.  
15 12(b)(2) (the "Motion to Dismiss") shall be filed on or before November 4, 2011;
- 16 (4) Defendant's reply in further support of its Motion to Dismiss shall be filed on or  
17 before November 16, 2011;
- 18 (5) Plaintiffs and Defendant will request a mutually agreeable hearing date for the  
19 Motion to Dismiss, to be set for on or after December 1, 2011.

20 Respectfully submitted,

21 GRELLAS SHAH LLP

PATTERSON SHERIDAN LLP

22  
23 By:                   /s/                    
24 Dhaivat H. Shah, Esq.  
25 Attorneys for Plaintiffs  
26 GLOBALNAVSOURCE, INC. and  
27 TRAILBEHIND, INC.

By:                   /s/                    
Keith Jaasma, Esq.  
Attorneys for Defendant  
FOREFLIGHT LLP

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CERTIFICATION OF CONCURRENCE

I, Dhaivat H. Shah, attest that Keith Jaasma has concurred in the filing of this document.

\_\_\_\_\_/s/\_\_\_\_\_  
Dhaivat H. Shah

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

By:   
\_\_\_\_\_  
Hon. Maria Elena James  
United States Magistrate Judge

Date: August 4, 2011  
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