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1 2 3 4 5 6 7 8 9 10	J. Andrew Coombs (SBN 123881) andy@coombspc.com Nicole L. Drey (SBN 250235) nicole@coombspc.com J. Andrew Coombs, A P. C. 517 East Wilson Avenue, Suite 200 Glendale, California 91206 Telephone: (818) 500-3200 Facsimile: (818) 300-3201 Attorneys for Plaintiff Adobe Systems Incorporated John D. McCurdy (SBN 54091) jmccurdy@jmll.com Reagan E. Boyce (SBN 248064) reagan.boyce@jmll.com McCurdy & Leibl, LLP 12925 Riverside Drive, Third Floo	2		Pager of 4	
11 12 13 14 15 16 17	Sherman Oaks, California 91423 Telephone: (818) 380-0123 Facsimile: (818) 380-0124 Attorneys for Defendants Maryam Ghermazian, an individua d/b/a www.saveintheusa.com, and Technology One Online d/b/a Tech Technology 1 and Technology One Corporation	al and h 1, e			
18	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)				
18	NORTHERN DIST	TRICT OF CAL	LIFORNIA (SAN	FRANCISCO)	
20	Adobe Systems Incorporated,)	Case No. CV1	1-3882 JSW	
21	Plaintiff, v.)	MANAGEMI [PROPOSED	ON TO CONTINUE CAS ENT CONFERENCE AN ORDER AS MODIFIEI	D
22	Maryam Ghermazian, et al.)	Date: Decer	HEREIN mber 2, 2011	
23 24	Defendants	s.))	Time: 1:30 p.m. Court: Hon. Jeffrey S. White		
25	ALL RELATED CLAI	MS			
26 27	PLAINTIFF Adobe System) ns Incorporated ("Adobe"), by and	l through its counsel of reco	ord,
27 28	and Defendants Maryam Ghermazian, an individual and d/b/a www.saveintheusa.com, and				
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1	Technology One Online d/b/a Tech 1, Technology 1 and Technology One Corporation
2	(collectively "Defendants"), by and through their counsel of record, hereby stipulate and request as
3	follows:
4	WHEREAS Adobe filed its complaint on or about August 8, 2011;
5	WHEREAS counsel for Defendants first contacted counsel for Adobe on or about
6 7	November 10, 2011, regarding her recent retention by Defendants;
8	WHEREAS counsel for Defendants has indicated that she will accept service for
9	Defendants;
10	
11	WHEREAS an Acknowledgment of Service is being sent to counsel for Defendants on or
12	about November 10, 2011;
13	WHEREAS counsel for Defendants has not yet reviewed the Complaint and will need
14	sufficient time to prepare a response;
15	WHEREAS the return of the Acknowledgment will give Defendants until January 9, 2012,
16	to respond to the Complaint;
17	WHEREAS Defendant Morris Cohen a/k/a Morris Kohanian, an individual and d/b/a
18	www.saveintheusa.com ("Cohen"), remains unserved;
19 20	WHEREAS Adobe has until December 6, 2011, to serve Defendant Cohen;
20 21	WHEREAS briefly continuing the Case Management Conference and all corresponding
22	deadlines will provide the Parties with additional time to possibly resolve this matter informally or,
23	alternatively, better brief the Court regarding the Parties' positions and any outstanding issues; and
24	WHEREAS Defendants by agreeing to a continuation of the case management conference
25	do not intend to waive, and expressly reserve any and all rights or defenses, including those based
26	on subject matter jurisdiction, personal jurisdiction or venue.
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- 2 -

1 2 3 4 5	NOW, THEREFORE, Adobe and Defendants respectfully request the Court continue the Joint Case Management Conference for approximately ninety (90) days, or not earlier than March 2, 2012. IT IS SO STIPULATED.	
6 7 8 9	DATED: November <u>10</u> , 2011 J. Andrew Coombs, A Professional Corp. By: <u>J. Andrew Coombs</u> Nicole L. Drey Attorneys for Plaintiff Adobe Systems Incorporated	
10 11 12 13 14 15	DATED: November <u>10</u> , 2011 McCurdy & Leibl, LLP By: <u>John D. McCurdy</u> Reagan E. Boyce Attorneys for Defendants Maryam Ghermazian and Technology One Online	
 16 17 18 19 20 21 22 23 24 25 26 	<u>PROPOSED ORDER</u> PURSUANT TO REQUEST, IT IS HEREBY ORDERED that the Case Management Conference March 16, 2012 at 1:30 p.m. A joint case management statement is due on shall be continued to 2012. If Plaintiff requires additional time to serve Defendant Cohen, they s the appropriate request with the Court. DATED: November 28,, 2011 Hon. Jeffrer A. WHYE UNITED HOTEL DISTRICT JUDGE	
27 28	Adobe v. Ghermazian, et al.: Stipulation to Continue CMC - 3 -	