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12 Attorneys for Defendants Francis Pierre and
 Futursoft Solutions, Inc., erroneously sued
 13 as Francis Pierre, an individual and d/b/a
 www.futursoftsolutions.com, Isaac Abady
 14 and Computer Software Plus, Inc.,
 erroneously sued as Isaac Abady a/k/a Ike
 15 Abady a/k/a Ike Abadi a/k/a Ike Ababi, an
 individual and d/b/a
 16 www.topdealscenter.com and Top Deals
 Center
 17

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)**

| | | | |
|----|-----------------------------|---|--|
| 20 | Adobe Systems Incorporated, |) | Case No. C11-3885 CRB |
| 21 | |) | |
| 22 | Plaintiff, |) | STIPULATION TO EXTEND ADR |
| | v. |) | DEADLINE AND CONTINUE |
| 23 | Matthew Rene, et al., |) | FURTHER CASE MANAGEMENT |
| | |) | CONFERENCE AND [REDACTED] |
| 24 | Defendants. |) | ORDER |
| | |) | Current ADR Deadline: July 30, 2012 |
| 25 | |) | CMC: August 10, 2012 |
| 26 | |) | Time: 8:30 a.m. |
| 27 | |) | Court: Hon. Charles R. Breyer |

1 PLAINTIFF Adobe Systems Incorporated (“Adobe”), by and through its counsel of record,
2 and Defendants Francis Pierre and Futursoft Solutions, Inc., erroneously sued as Francis Pierre, an
3 individual and d/b/a www.futursoftsolutions.com, Isaac Abady and Computer Software Plus, Inc.,
4 erroneously sued as Isaac Abady a/k/a Ike Abady a/k/a Ike Abadi a/k/a Ike Ababi, an individual
5 and d/b/a www.topdealscenter.com and Top Deals Center (collectively “Defendants”), by and
6 through their counsel of record, hereby stipulate and request as follows:
7

8 WHEREAS a Case Management Conference was held on April 20, 2012;

9 WHEREAS the Court ordered a Further Case Management Conference on June 8, 2012, to
10 occur after mediation had taken place;

11 WHEREAS the Parties had scheduled mediation to take place on July 17, 2012;

12 WHEREAS the Further Case Management Conference was then continued until August 10,
13 2012, to occur after the mediation;

14 WHEREAS Defendants’ counsel informed Plaintiff’s counsel and the mediators on July 9,
15 2012, regarding a family emergency that would prevent him from attending the mediation;

16 WHEREAS Defendants’ counsel is a solo practitioner who did not have any associate or
17 co-counsel who could represent Defendants in his stead;

18 WHEREAS Plaintiff and the mediators consented to the continuance of the mediation due
19 to Defendants’ counsel’s extraordinary circumstances;

20 WHEREAS Defendants’ counsel has been out of the office for the past few weeks due to
21 said family emergency;

22 WHEREAS the Parties are now currently attempting to re-schedule the mediation for a time
23 in August or September;

24 WHEREAS extending the ADR deadline by sixty (60) days and continuing the Case
25 Management Conference until after the mediation will allow the Parties sufficient time to attempt
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1 to resolve this matter without further intervention of the Court as well as allow sufficient time for
2 Defendants' counsel to address his overdue commitments from his extended absence; and

3 WHEREAS no other Court deadlines will be affected by an extension of the ADR deadline
4 or continuation of the Case Management Conference.
5

6 NOW, THEREFORE, Adobe and Defendants stipulate and respectfully request the Court
7 extend the ADR deadline to September 30, 2012, and continue the Joint Case Management
8 Conference until October 19, 2012, or a date thereafter acceptable with the Court.

9 IT IS SO STIPULATED.

10
11 DATED: 7/31/2012

J. Andrew Coombs, A Professional Corp.

12 By: /s/ Nicole L. Drey
13 J. Andrew Coombs
14 Nicole L. Drey
Attorneys for Plaintiff

15 DATED: 7/31/2012

Winghart Law Group

16
17 By: /s/ Andrew D. Winghart
18 Andrew D. Winghart
Attorneys for Defendants

19 ~~PROPOSED~~ ORDER

20 PURSUANT TO REQUEST, IT IS HEREBY ORDERED that the ADR Deadline is extended to
21 September 30, 2012. It is further ordered that the Case Management Conference
22 shall be continued to October 19, 2012 at 8:30 a.m.

23
24 DATED: August 1, 2012

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26
27 Hon. Charles R.
UNITED STATES

