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5 Attorneys for Third Party  
 IPValue Management, Inc.

6 UNITED STATES DISTRICT COURT  
 7 NORTHERN DISTRICT OF CALIFORNIA  
 8 SAN FRANCISCO DIVISION  
 9

10 GOOGLE, INC., and YOUTUBE, LLC,

11 Plaintiff(s),

12 v.

13 IPVALUE MANAGEMENT INC.,

14 Defendant.

Case No. C11-80016 MISC RS (BZ)

**STIPULATION TO EXTENSION OF  
 TIME FOR THIRD PARTY  
 IPVALUE MANAGEMENT, INC. TO  
 FILE OPPOSITION TO GOOGLE,  
 INC.' S AND YOUTUBE, LLC' S  
 MOTION TO COMPEL  
 PRODUCTION OF DOCUMENTS;  
 DECLARATINO OF PETER C.  
 McMAHON; AND [PROPOSED]  
 ORDER**

1           **WHEREAS**, pursuant to this Court’s February 3, 2011 Second Discovery Order,  
2 IPValue Management, Inc.’s (“IPValue”) Opposition to Google Inc. and YouTube, LLC’s  
3 (collectively “Google”) January 26, 2011 Motion to Compel Documents is due on or before  
4 February 25, 2011, and

5           **WHEREAS**, IPValue requests an extension of time beyond the date imposed by  
6 the Court to file its Opposition, and Google does not oppose.

7           **NOW THEREFORE**, the parties hereto, by and through their respective counsel  
8 of record, stipulate and agree to the following:

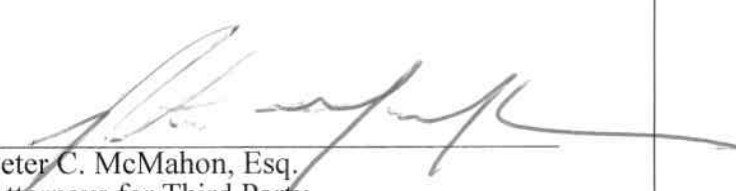
9           1.       IPValue’s Opposition to Google’s Motion to Compel Documents shall be  
10 due on or before March 4, 2011.

11           2.       Google’s Reply in support of its Motion to Compel Documents shall be  
12 due on or before March 11, 2011.

13 **IT IS SO STIPULATED.**

14  
15 Dated: February 25, 2011

16 MCMAHON SEREPCA LLP

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19 Peter C. McMahon, Esq.  
20 Attorneys for Third Party  
21 IPVALUE MANAGEMENT, INC.

22  
23 Dated: February 25, 2011

24 QUINN EMANUEL URQUHART &  
25 SULLIVAN, LLP

26  
27 /s/ Andrea Pallios Roberts  
28 Andrea Pallios Roberts, Esq.  
Attorneys for Google, Inc. and YouTube, LLC

**DECLARATION IN SUPPORT OF STIPULATION**

I, Peter C. McMahon, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts of the State of California. I am a Partner with McMahon Serepca LLP, representing third party IPValue Management, Inc.. I have personal knowledge of the facts set forth herein, and, if called upon to testify thereto, I am competent to do so and would do so.

2. The request for a one week extension for IPValue Management, Inc. to file its Opposition to Google, Inc.'s and YouTube, LLC's Motion to Compel Documents is for the purpose of permitting the parties to narrow and resolve as many of their current disputes as possible. To date, the parties have resolved several disputes.

3. The Court ordered a teleconference between the parties for February 3, 2011. Thereafter, the Court ordered the parties to meet and confer, and if they could not resolve their disputes for IPValue Management, Inc. to file its Opposition on February 25, 2011.

4. Since February 3, 2001, the parties have engaged in a series of meet and confer efforts have narrowed many of their disputes. As of February 25, 2011, the parties had not either reached total agreement, or total impasse – and it was agreed to continue working into the following week on the issues.

5. The requested extension is very brief, only one week, and would not significantly affect any schedule for this miscellaneous case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Carlos, California on February 25, 2011.

  
Peter C. McMahon

1 **ORDER**

2 **PURSUANT TO THE ABOVE STIPULATION AND GOOD CAUSE**

3 **APPEARING THEREFORE, IT IS ORDERED** that the date for IPValue Management, Inc.'s  
4 Opposition to Google, Inc.'s and YouTube LLC's Motion to Compel Production of Documents  
5 shall be extended from February 25, 2011, to March 4, 2011.

6 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

7  
8  
9 Dated: February 28, 2011

  
Bernard Zimmerman

United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2  
3 I, Peter C. McMahon, hereby certify that on February 25, 2011, McMahon  
4 Serepca LLP electronically filed the Stipulation to Extension of Time for Third Party IPValue  
5 Management, Inc. To File Opposition to Google, Inc.’s and YouTube, LLC’s Motion to Compel  
6 Production of Documents; Declaration of Peter C. McMahon; and [Proposed] Order (“Stip &  
7 Order) with the Clerk of the Court using CM/ECF. Prior to filing, I emailed the Stip & Order to:

8 Charles K. Verhoeven – [charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)

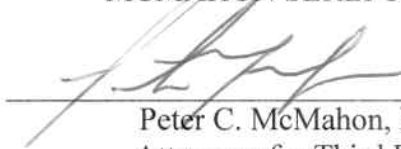
9 David A. Perlson – [davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)

10 Eugene Novikov – [eugenenovikov@quinnemanuel.com](mailto:eugenenovikov@quinnemanuel.com)

11 Andrea Pallios Roberts - [andrearoberts@quinnemanuel.com](mailto:andrearoberts@quinnemanuel.com)

12  
13 Dated: February 25, 2011

MCMAHON SEREPCA LLP

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16 Peter C. McMahon, Esq.  
17 Attorneys for Third Party  
18 IPVALUE MANAGEMENT, INC.  
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