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

14
 15 GOOGLE, INC., and YOUTUBE, LLC,
 16 Plaintiff(s),
 17 v.
 18 IPVALUE MANAGEMENT INC.,
 19 Defendant.

Case No. C11-80016 MISC RS (BZ)

**STIPULATION TO EXTENSION OF
 TIME FOR GOOGLE INC. TO FILE
 REPLY IN SUPPORT OF MOTION
 TO COMPEL PRODUCTION OF
 DOCUMENTS; AND [PROPOSED]
 ORDER**

1
2 **WHEREAS**, pursuant to this Court's February 28, 2011 Order (Dkt no. 17),
3 Google Inc.'s Reply in support of its Motion to Compel Documents is due on or before March
4 11, 2011, and

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

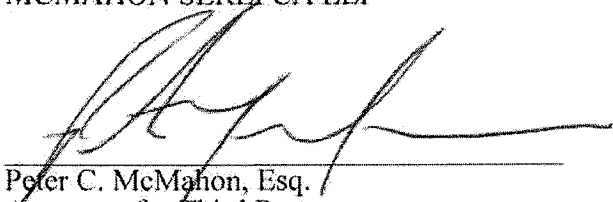
7 **NOW THEREFORE**, the parties hereto, by and through their respective counsel
8 of record, stipulate and agree to the following:

9 1. Google's Reply in support of its Motion to Compel Documents shall be
10 due on or before March 15, 2011.

11 **IT IS SO STIPULATED.**

12
13 Dated: March 10, 2011

MCMAHON SEREPCA LLP

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17 _____
18 Peter C. McMahon, Esq.
19 Attorneys for Third Party
20 IPVALUE MANAGEMENT, INC.

21 Dated: March 11, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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23
24 /s/ Andrea Pallios Roberts
25 Andrea Pallios Roberts, Esq.
26 Attorneys for Google, Inc. and YouTube, LLC
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2 **DECLARATION IN SUPPORT OF STIPULATION**

3 I, Andrea Pallios Roberts, declare as follows:

4 1. I am an attorney authorized to practice law in the State of California. I am
5 an associate at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for
6 Google Inc. in this matter. I have personal knowledge of the facts set forth herein, and, if called
7 upon to testify, could and would competently testify thereto.

8 2. The Court ordered a teleconference between the parties for February 3,
9 2011. Thereafter, the Court ordered the parties to meet and confer, and if they could not resolve
10 their disputes for IPValue Management, Inc. to file its opposition on February 25, 2011. Google
11 did not oppose IPValue's February 25 request for a one-week extension of time to file its
12 opposition.

13 3. Google now requests a two-business day extension of time to file its Reply
14 in support of its Motion to Compel Documents because during the week Google had to draft its
15 Reply, one of its attorneys was ill and I was out of the office to attend the funeral of a family
16 member. Neither event was foreseen when the parties executed the February 25 stipulation.

17 4. Google has not previously requested an extension of time to file its Reply.
18 The requested extension is very brief, only two business days, and would not significantly affect
19 any schedule for this case.

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

22 Executed at Redwood Shores, California on March 11, 2011.

23 /s/ Andrea Pallios Roberts
24 Andrea Pallios Roberts

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ORDER

PURSUANT TO THE ABOVE STIPULATION AND GOOD CAUSE

APPEARING THEREFORE, IT IS ORDERED that the date for Google Inc. to file its reply in support of its Motion to Compel Production of Documents shall be extended from March 11, 2011, to March 15, 2011.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March __, 2011

Bernard Zimmerman
United States Magistrate Judge