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*Attorneys for Plaintiff*  
*MOUNT HAMILTON PARTNERS, LLC*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

19 MOUNT HAMILTON PARTNERS, LLC,  
 20  
 21 Plaintiff/Counterdefendant,  
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 23 v.  
 24  
 25 GOOGLE, INC.,  
 26  
 27 Defendant/Counterclaimant.

Case No. 3:12-CV-1698-SI

**STIPULATION AND [PROPOSED]  
 ORDER CONTINUING FURTHER CASE  
 MANAGEMENT CONFERENCE**

[Civ. L.R. 6-2 & 7-12]

28 Case Nos. C-12-1698 and  
 C-12-1700

1 MOUNT HAMILTON PARTNERS, LLC,

Case No. 3:12-CV-1700-SI

2 Plaintiff/Counterdefendant,

3 v.

4 Groupon, INC.,

5  
6 Defendant/Counterclaimant.  
7

8 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Mount Hamilton Partners, LLC (“MHP” or  
9 “Plaintiff”) and Defendants<sup>1</sup> Groupon, Inc. (“Groupon”) and Google, Inc. (“Google”)  
10 (collectively, “Defendants”), by and through their respective undersigned counsel, hereby jointly  
11 move the Court for an order continuing the scheduled date for a Further Case Management  
12 Conference, for the following reasons:

13 1. Pursuant to this Court’s September 25, 2012 Case Management Conference Order  
14 (Dkt. No. 47), the parties are required to participate in a Further Case Management Conference on  
15 May 10, 2013.

16 2. On May 3, 2013, this Court continued the Claim Construction Tutorial and Claim  
17 Construction Hearing to June 20, 2013 and June 26, 2013, respectively.

18 3. Accordingly, because it is the belief of the parties that holding a Further Case  
19 Management Conference after the date of the Claim Construction Hearing in this case will be  
20 more efficient for this Court and the parties, the parties hereby stipulate to and request the Court to  
21 continue the Further Case Management Conference from May 10 to August 23, 2013 at 3:00 p.m.  
22 or such other date and time that is agreeable with the Court’s calendar. The requested continuance  
23 does not affect any other deadline ordered by the Court.  
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26  
27 <sup>1</sup> The two above captioned cases (Mount Hamilton Partners, LLC v. Google Inc., Case No. 3:12-  
28 cv-1698-SI (“Google case”); Mount Hamilton Partners, LLC v. Groupon, Inc., Case No. 3:12-cv-  
1700-SI (“Groupon case”)) were consolidated for claim construction purposes only.

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Dated: May 8, 2013

By: /s/ Callie Bjurstrom  
CALLIE A. BJURSTROM  
JENNA F. KARADBIL

Attorneys for Plaintiff  
MOUNT HAMILTON PARTNERS, LLC

Dated: May 8, 2013

By: /s/ Adrian Shin  
JAMES T. HULTQUIST  
KHURRAM NASIR GORE  
ADRIAN SHIN

Attorneys for Defendant  
GROUPON, INC.

Dated: May 8, 2013

By: /s/ James F. Valentine  
JAMES F. VALENTINE

Attorney for Defendant  
GOOGLE INC.

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

Dated: 5/9, 2013

  
\_\_\_\_\_  
HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT COURT JUDGE

**SIGNATURE ATTESTATION**

I, Adrian Shin, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 8, 2013

REED SMITH LLP

By: /s/ Adrian Shin  
Adrian Shin  
Attorneys for Defendant  
GROUPON, INC.

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*Attorneys for Plaintiff*  
*MOUNT HAMILTON PARTNERS, LLC*

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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION  
19

20 MOUNT HAMILTON PARTNERS, LLC,  
21 Plaintiff/Counterdefendant,  
22 v.  
23 GOOGLE, INC.,  
24 Defendant/Counterclaimant.  
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Case No. 3:12-CV-1698-SI

**DECLARATION OF KHURRAM N. GORE  
IN SUPPORT OF STIPULATION AND  
[PROPOSED] ORDER CONTINUING  
FURTHER CASE MANAGEMENT  
CONFERENCE**

**[Civ. L.R. 6-2 & 7-12]**

1 MOUNT HAMILTON PARTNERS, LLC,

Case No. 3:12-CV-1700-SI

2 Plaintiff/Counterdefendant,

3 v.

4 GROUPON, INC.,

5 Defendant/Counterclaimant.

6  
7 I, Khurram Nasir Gore, declare:

8 1. I am an associate with Reed Smith LLP, counsel for Defendants Groupon, Inc.  
9 (“Groupon”), in the above-captioned action. The contents of this declaration are based upon my  
10 personal knowledge and are true and correct to the best of my knowledge and belief. If called upon  
11 I could and would testify competently thereto.

12 2. On September 25, 2012, this Court entered the Case Management Conference Order  
13 (Dkt. No. 47).

14 3. Pursuant to the Case Management Conference Order, the parties are required to  
15 participate in a Further Case Management Conference on May 10, 2013.

16 4. On May 3, 2013, this Court continued the Claim Construction Tutorial and Claim  
17 Construction Hearing to June 20, 2013 and June 26, 2013, respectively.

18 6. Accordingly, because it is the belief of the parties that holding a Further Case  
19 Management Conference after the date of the Claim Construction Hearing in this case will be more  
20 efficient for this Court and the parties, the parties have agreed to continue the Further Case  
21 Management Conference from May 10 to August 23, 2013 at 3:00 p.m. or such other date and time  
22 that is agreeable with this Court’s calendar. The requested continuance does not affect any other  
23 deadline ordered by this Court.

24 I declare under penalty of perjury of the laws of the United States of America that the  
25 foregoing is true and correct.

26 DATED: May 8, 2013.

27  
28 By /s/ Khurram Nasir Gore  
Khurram Nasir Gore