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Attorneys for Plaintiff
MOUNT HAMILTON PARTNERS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 MOUNT HAMILTON PARTNERS, LLC,
 19
 20 Plaintiff/Counterdefendant,
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 22 v.
 23 GROUPON, INC.,
 24
 25 Defendant/Counterclaimant.

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

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

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

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Mount Hamilton Partners, LLC (“MHP” or
2 “Plaintiff”) and Defendant Groupon, Inc. (“Groupon”), by and through their respective
3 undersigned counsel, hereby jointly move the Court for an order continuing the scheduled date for
4 a Further Case Management Conference, for the following reasons:

5 1. Pursuant to this Court’s January 22, 2014 Notice Continuing Further Case
6 Management Conference (Dkt. No. 101), the parties are scheduled to participate in a Further Case
7 Management Conference on February 26, 2014.

8 2. Due to scheduling conflicts, counsel for Groupon and MHP are both unavailable on
9 February 26, 2014. Counsel for Plaintiff and Groupon join in the request for continuing the date
10 for the Further Case Management Conference to the next available date on the Court’s calendar.

11 3. Accordingly, the parties hereby stipulate to and request the Court to continue the
12 Further Case Management Conference from February 26 to March 14, 2013 at 3:00 p.m. or such
13 other date and time that is agreeable with the Court’s calendar. The requested continuance does
14 not affect any other deadline ordered by the Court.

15
16 Dated: February 10, 2014

17
18 By: /s/ Khurram Nasir Gore
19 JAMES T. HULTQUIST
20 KHURRAM NASIR GORE
21 ADRIAN SHIN

22 Attorneys for Plaintiff
23 Groupon, Inc.

24 Dated: February 10, 2014

25 By: /s/ Jenna F. Karadbil
26 CALLIE A. BJURSTROM
27 JENNA F. KARADBIL

28 Attorneys for Defendant
MOUNT HAMILTON PARTNERS, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: Feb 11, 2014



HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE

SIGNATURE ATTESTATION

I, Khurram Nasir Gore, 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: February 10, 2014

REED SMITH LLP

By: /s/ Khurram Nasir Gore
Khurram Nasir Gore
Attorneys for Defendant
GROUPON, INC.

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Attorneys for Plaintiff
MOUNT HAMILTON PARTNERS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOUNT HAMILTON PARTNERS, LLC,

Plaintiff/Counterdefendant,

v.

GROUPON, INC.,

Defendant/Counterclaimant.

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

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

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

1 I, Khurram Nasir Gore, declare:

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

6 2. Pursuant to this Court’s January 22, 2014 Notice Continuing Further Case
7 Management Conference (Dkt. No. 101), the parties are scheduled to participate in a Further Case
8 Management Conference on February 26, 2014.

9 3. Counsel for Groupon is unavailable on February 26, 2014.

10 4. I have conferred with counsel for Plaintiff Mount Hamilton Partners, LLC
11 (“MHP”), and counsel for MHP is also unavailable on February 26, 2014.

12 4. Accordingly, the parties hereby stipulate to and request the Court to continue the
13 Further Case Management Conference from February 26 to March 14, 2014 at 3:00 p.m. or such
14 other date and time that is agreeable with the Court’s calendar. The requested continuance does
15 not affect any other deadline ordered by the Court.

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

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19 DATED: February 10, 2014.

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21 By /s/ Khurram Nasir Gore
22 Khurram Nasir Gore
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