

1 James T. Hultquist (pro hac vice)  
 2 jhultquist@reedsmith.com  
 3 Khurram N. Gore (pro hac vice)  
 4 kgore@reedsmith.com  
 5 REED SMITH LLP  
 6 101 Second Street, Suite 1800  
 7 San Francisco, CA 94105-3659  
 8 Telephone: (415) 543-8700  
 9 Facsimile: (415) 391.8269

10 *Attorneys for Defendant*  
 11 *GROUPON, INC.*

Callie A. Bjurstrom  
 callie.bjurstrom@pillsburylaw.com  
 California State Bar No. 137816  
 PILLSBURY WINTHROP SHAW  
 PITTMAN LLP  
 501 West Broadway  
 San Diego, California 92101  
 Telephone: (619) 234-5000  
 Facsimile: (619) 236-1995

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

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN FRANCISCO DIVISION**

15 MOUNT HAMILTON PARTNERS, LLC,

16 Plaintiff/Counterdefendant,

17 v.

18 GROUPON, INC.,

19 Defendant/Counterclaimant.

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

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER CONTINUING STATUS  
 CONFERENCE AND DEADLINE FOR  
 FILING UPDATED JOINT CASE  
 MANAGEMENT STATEMENT**

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

20 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Mount Hamilton Partners, LLC (“Mount  
 21 Hamilton” or “Plaintiff”) and Defendant Groupon, Inc. (“Groupon” or “Defendant”), by and  
 22 through their respective undersigned counsel, hereby jointly move the Court for an order  
 23 continuing the scheduled date for a Status Conference and deadline for filing an updated joint case  
 24 management statement, for the following reasons:

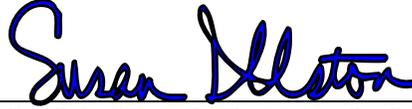
- 25 1. The parties have reached a settlement and are currently conducting negotiations to  
 26 finalize an agreement to resolve this action.
- 27 2. Pursuant to this Court’s April 9, 2014 Pretrial Order (Dkt. No. 117) and subsequent  
 28

Case No. 3:12-CV-1700



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

2 Dated: 7/16, 2014

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5 HONORABLE SUSAN ILLSTON  
6 UNITED STATES DISTRICT COURT JUDGE

7  
8 **SIGNATURE ATTESTATION**

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

12  
13 Dated: July 11, 2014

Pillsbury Winthrop Shaw Pittman LLP

14  
15 By: /s/ Callie A. Bjurstrom

16 Callie A. Bjurstrom

17 Attorney for Plaintiff

18 MOUNT HAMILTON PARTNERS, LLC

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28 STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS CONFERENCE AND DEADLINE FOR  
FILING UPDATED JOINT CASE MANAGEMENT STATEMENT

1 Callie A. Bjurstrom  
callie.bjurstrom@pillsburylaw.com  
2 California State Bar No. 137816  
PILLSBURY WINTHROP SHAW  
3 PITTMAN LLP  
501 West Broadway  
4 San Diego, California 92101  
Telephone: (619) 234-5000  
5 Facsimile: (619) 236-1995

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

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 MOUNT HAMILTON PARTNERS, LLC,

13 Plaintiff/Counterdefendant,

14 v.

15 Groupon, Inc.,

16 Defendant/Counterclaimant.  
17

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

**DECLARATION OF CALLIE A.  
BJURSTROM IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER CONTINUING STATUS  
CONFERENCE AND DEADLINE FOR  
FILING UPDATED JOINT CASE  
MANAGEMENT STATEMENT**

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19 I, Callie A. Bjurstrom, declare:

20 1. I am a partner at Pillsbury Winthrop Shaw Pittman LLP, counsel for Plaintiff Mount  
21 Hamilton Partners, LLC (“Mount Hamilton”), in the above-captioned action. The contents of this  
22 declaration are based upon my personal knowledge and are true and correct to the best of my  
23 knowledge and belief. If called upon I could and would testify competently thereto.

24 2. Mount Hamilton and Defendant Groupon, Inc. (“Groupon”) have reached a  
25 settlement and are currently conducting negotiations to finalize an agreement to resolve this action  
26 and all related disputes.  
27  
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1 CALLIE A. BJURSTROM (State Bar No. 137816)  
2 [callie.bjurstrom@pillsburylaw.com](mailto:callie.bjurstrom@pillsburylaw.com)  
3 PILLSBURY WINTHROP SHAW PITTMAN LLP  
4 501 W. Broadway, Suite 1100  
5 San Diego, CA 92101-3575  
6 Telephone: (619) 234-5000  
7 Facsimile No.: (619) 236-1995

8 Attorneys for Plaintiff  
9 MOUNT HAMILTON PARTNERS, LLC

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

11	_____ )	
12	MOUNT HAMILTON PARTNERS LLC, )	Case No. 3:12-cv-01700-SI
13	Plaintiff, )	PROOF OF SERVICE
14	vs. )	Judge: Hon. Susan Illston
15	GROUPON, INC., )	
16	Defendant. )	
	_____ )	

17 I, Callie A. Bjurstrom, the undersigned, hereby declare as follows:

- 18 1. I am over the age of 18 years and am not a party to the within cause. I am  
19 employed by Pillsbury Winthrop Shaw Pittman LLP in the City of San Diego, California.  
20 2. My email and business addresses are [callie.bjurstrom@pillsburylaw.com](mailto:callie.bjurstrom@pillsburylaw.com), 501  
21 W. Broadway, Suite 1100, San Diego, CA 92101-3575.

22 3. On July 11, 2014, I served a true copy of the documents titled exactly

23 **STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS**  
24 **CONFERENCE AND DEADLINE FOR FILING UPDATED JOINT CASE**  
25 **MANAGEMENT STATEMENT; and DECLARATION OF CALLIE A.**  
26 **BJURSTROM IN SUPPORT OF STIPULATION AND [PROPOSED] ORDER**  
27 **CONTINUING STATUS CONFERENCE AND DEADLINE FOR FILING**  
28

1 **UPDATED JOINT CASE MANAGEMENT STATEMENT** were served via electronic  
2 transmission to the following persons at the electronic-mail addresses so indicated:

3 James T. Hultquist  
4 REED SMITH LLP  
5 10 South Wacker Drive, Suite 4000  
6 Chicago, IL 60606-7507  
7 Telephone: (312) 207-1000  
8 Facsimile: (312) 207-6400  
9 Email: [jhultquist@reedsmith.com](mailto:jhultquist@reedsmith.com)

7 Adrian Sue Shin (SBN 256960)  
8 REED SMITH LLP  
9 101 Second Street, Suite 1800  
10 San Francisco, CA 94105-3659  
11 Telephone: (415) 543-8700  
12 Facsimile: (415) 391-8269  
13 Email: [sshin@reedsmith.com](mailto:sshin@reedsmith.com)

11 I declare under penalty of perjury that the foregoing is true and correct. Executed  
12 this 11th day of July, 2014, at San Diego, CA.

14  
15 /s/ Callie A. Bjurstrom  
16 Callie A. Bjurstrom

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