1	James S. Greenan (SBN 53648) Chip Cox (SBN 159681)		
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3 4	San Ramon, California 94583 Telephone: 925-866-1000 Facsimile: 925-830-8787		
5	Attorneys for Defendant		
6	Foray Technologies, LLC		
7			
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	KWAN SOFTWARE ENGINEERING, INC,	Case No.: CV-12-03762 PSG	
13	a California Corporation, dba VERIPIC, INC.,	CHARLES ATTACK AND INDODOCEDIA	
14	Plaintiff,)	STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR	
15	VS.	MEDIATION	
16	FORAY TECHNOLOGIES, LLC, a Delaware) Limited Liability Company,		
17	Defendant.		
18	}		
19)		
20			
21	Plaintiff Kwan Software Engineering, Inc., dba Veripic, Inc., ("Veripic") and defendant		
22	Foray Technologies, LLC ("Foray") stipulate as follows:		
23	WHEREAS, the Court ordered the parties to complete mediation in this matter by the end		
24	of April 2013;		
25	WHEREAS, plaintiff alleges that defendant (1) had access to plaintiff's software,		
26	(2) copied, decompiled, disassembled, and/or modified plaintiff's software, and (3) defendant		
27	created an unauthorized derivative work based on Veripic's software, which defendant offered		
28	for sale and distribution in September 2009;		

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1 WHEREAS, defendant generally denies these allegations, and more specifically 2 (1) denies that it had access to plaintiff's software, (2) denies that it copied, decompiled, 3 disassembled, and/or modified plaintiff's software, and (3) contends that the software defendant 4 offered for sale and distribution in September 2009 is substantially similar to the software it 5 offered for sale and distribution since before plaintiff began distributing its software; 6 WHEREAS, defendant contends that it requires some understanding of the factual basis 7 for plaintiff's allegations before any meaningful mediation can be held; and 8 WHEREAS, defendant believes it will require an additional 60 to 90 days to obtain 9 discovery from plaintiff, review that information, and conduct further appropriate third-party 10 discovery and investigation necessary for any meaningful mediation; 11 111 12 /// 13 /// 14 15 16 /// 17 /// 18 /// 19 /// 20 /// 21 /// 22 23 /// 24 /// 25 26 27 28

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1	THEREFORE, plaintiff and defendants stipulate and agree that the deadline for the	
2	parties to complete mediation should be continued to the end of July 2013.	
3	Dated: January 30, 2013	
4		GREENAN, PEFFER, SALLANDER & LALLY LLP
5		
6		Bv:/s/
7	·	Chip Cox Attorneys for Defendant Foray Technologies, LLC
8		Automeys for Defendant Foray Technologies, LLC
9		
10	Dated: January 30, 2013	
11		GRELLAS SHAH LLP
12		,
13]	By:/s/ Dhaivat Shah
14		Attorneys for Plaintiff Kwan Software Engineering
15		inc., dba Veripic. Inc.
16	IT IS SO ORDERED	
17	Dated: February, 2013	
18		
19		
20		and Decur
21		SUSAN ILLSTON
22		United States District Court Judge
23		
24		
25		
26		
27		
28		

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