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6 Attorneys for Plaintiff
 INTEGRAL DEVELOPMENT CORP.

7
 8 IN THE UNITED STATES DISTRICT COURT
 9 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 INTEGRAL DEVELOPMENT CORP, a California
 corporation,

Case No.: 3:12-cv-06575-JSW (LB)

12
 13 Plaintiff,

**REVISED JOINT STIPULATION AND
 [PROPOSED] SCHEDULING ORDER**

14 v.

15 VIRAL TOLAT, an individual, and DOES 1-20,

16 Defendant.
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1 **JOINT STIPULATION**

2 WHEREAS, Plaintiff Integral Development Corporation (“Integral”) and Defendant Viral Tolat
3 (“Tolat”) engaged in a Settlement Conference on July 12, 2013 before Magistrate Judge Jacqueline
4 Corley (Dkt. 105);

5 IT IS HEREBY STIPULATED that in the interests of judicial economy and in order to
6 facilitate further settlement discussions, all stipulated and ordered filing deadlines, as enumerated
7 below, be continued until at least **July 19, 2013**;

8 IT IS HEREBY STIPULATED that the following deadlines as set by Stipulation and Order re:
9 Schedule (Dkt 97) and by Joint Stipulation and [Proposed] Order to Re: Schedule (Dkt 104) are
10 amended to reflect this requested continuance:

- 11 1. Plaintiff Integral shall file its First Amended Complaint on **July 19, 2013**;
- 12 2. Defendant Tolat shall file his Answer and Counterclaims to Integral’s First Amended
13 Complaint, and/or move with respect to some or all of the Amended Complaint on **August**
14 **9, 2013**;
 - 15 a. If Defendant files a Rule 12 Motion, Plaintiff’s Opposition shall be filed by **August**
16 **23, 2013**; Defendant’s Reply shall be filed by **August 30, 2013**;
- 17 3. Plaintiff Integral shall Answer Defendant Tolat’s Counterclaims and/or file any Opposition
18 and/or responsive motions to such Counterclaims on **August 30, 2013**;
 - 19 a. ~~If Plaintiff files a Rule 12 motion, Defendant’s Opposition shall be filed by~~
20 **September 13, 2013**; ~~Plaintiff’s Reply shall be filed by~~ **September 20, 2013**;
- 21 4. Any motions filed by Plaintiff Integral pertaining to Defendant Tolat’s Counterclaims, and
22 any motions filed by Defendant Tolat concerning Plaintiff Integral’s Amended Complaint
23 shall be heard on September 27, 2013, at 9:00 a.m.
- 24 5. Plaintiff’s Motion for Sanctions Re: Spoliation and for Contempt
 - 25 a. Hearing Date: September 27, 2013 at 9:00 a.m.
 - 26 b. Plaintiff will file its moving papers by: **July 19, 2013**
 - 27 c. Defendant will file any opposition by: August 9, 2013
 - 28 d. Plaintiff will file any reply by: August 16, 2013.
 - e. Each brief will be no longer than 15 pages

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- 1 6. Plaintiff's Motions for Summary Adjudication and for Preliminary Injunction
2 a. Hearing Date: September 27, 2013 at 9:00 a.m.
3 b. Plaintiff will file its moving papers by: **July 19, 2013**
4 c. Defendant will file any opposition by: August 9, 2013
5 d. Plaintiff will file any reply by: August 16, 2013.
6 e. Each brief will be no longer than 25 pages.
7
8 7. Defendant's Motions (i) to hold Integral in contempt for e.g. altering evidence and (ii) for
9 sanctions against Integral for e.g. intentionally misleading the Court
10 a. Hearing Date: September 27, 2013 at 9:00 a.m.
11 b. Plaintiff will file its moving papers by: August 19, 2013
12 c. ~~Defendant will file any opposition by: September 9, 2013~~
13 d. ~~Plaintiff will file any reply by: September 20, 2013.~~
14 e. Each brief will be no longer than 15 pages
15
16 8. Defendant's Motions for Summary Judgment
17 a. Hearing Date: September 27, 2013 at 9:00 a.m.
18 b. Plaintiff will file its moving papers by: August 19, 2013
19 c. ~~Defendant will file any opposition by: September 9, 2013~~
20 d. ~~Plaintiff will file any reply by: September 20, 2013.~~
21 e. Each brief will be no longer than 25 pages.

22 **IT IS SO STIPULATED**

23 Dated: July 15, 2013

COMPUTERLAW GROUP LLP

24 By: /s/ Jack Russo
25 Jack Russo

26 Attorneys for Plaintiff
27 INTEGRAL DEVELOPMENT CORP.

28 Dated: July 15, 2013

KATTEN MUCHIN ROSENMAN LLP

By: /s/ Steven Eckhaus
Steven G. Eckhaus, pro hac vice
Stuart M. Richter

Attorneys for Defendant
VIRAL TOLAT

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION AND GOOD CAUSE SHOWN, the parties' joint request is
3 GRANTED, and the following schedule is hereby ORDERED:

- 4 1. Plaintiff Integral shall file its First Amended Complaint on **July 19, 2013**;
- 5 2. Defendant Tolat shall file his Answer and Counterclaims to Integral's First Amended
6 Complaint on **August 9, 2013**;
- 7 3. Plaintiff shall file its Answer and/or responsive motions to Defendant Tolat's
8 Counterclaims on **August 30, 2013**;
- 9 4. Any motions filed by Plaintiff Integral pertaining to Defendant Tolat's Counterclaims shall
10 be heard on **September 27, 2013, at 9:00 a.m.**
- 11 5. Plaintiff's Motion for Sanctions Re: Spoliation and for Contempt
- 12 a. Hearing Date: September 27, 2013 at 9:00 a.m.
 - 13 b. Plaintiff will file its moving papers by: **July 19, 2013**
 - 14 c. Defendant will file any opposition by: August 9, 2013
 - 15 d. Plaintiff will file any reply by: August 16, 2013.
 - 16 e. Each brief will be no longer than 15 pages
- 17 6. Plaintiff's Motions for Summary Adjudication and for Preliminary Injunction
- 18 a. Hearing Date: September 27, 2013 at 9:00 a.m.
 - 19 b. Plaintiff will file its moving papers by: **July 19, 2013**
 - 20 c. Defendant will file any opposition by: August 9, 2013
 - 21 d. Plaintiff will file any reply by: August 16, 2013.
 - 22 e. Each brief will be no longer than ²⁵~~35~~ pages.
- 23 7. Defendant's Motions (i) to hold Integral in contempt for e.g. altering evidence and (ii) for
24 sanctions against Integral for e.g. intentionally misleading the Court
- 25 a. Hearing Date: September 27, 2013 at 9:00 a.m.
 - 26 b. Plaintiff will file its moving papers by: August 19, 2013
 - 27 c. Defendant will file any opposition by: ^{September 3}~~September 9~~, 2013
 - 28 d. Plaintiff will file any reply by: ^{September 10}~~September 20~~, 2013.
 - e. Each brief will be no longer than 15 pages


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1 8. Defendant's Motions for Summary Judgment

- 2 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 3 b. Plaintiff will file its moving papers by: August 19, 2013
- 4 c. Defendant will file any opposition by: ~~September 9, 2013~~ ^{September 3} September 10, 2013
- 5 d. Plaintiff will file any reply by: ~~September 20, 2013.~~ ^{September 10}
- 6 e. Each brief will be no longer than 25 pages.

7 **IT IS SO ORDERED.**

8 Dated: July 18, 2013


The Honorable Jeffrey S. White
United States District Judge