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6 Attorneys for Plaintiff
 INTEGRAL DEVELOPMENT CORP.

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 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,
 12
 13 Plaintiff,
 14 v.
 15 VIRAL TOLAT, an individual, and DOES 1-20,
 16 Defendant.

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

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

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 26, 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 26, 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 **15, 2013**;
 - 15 a. If Defendant files a Rule 12 Motion, Plaintiff’s Opposition shall be filed by **August**
16 **29, 2013**; Defendant’s Reply shall be filed by **September 6, 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 **September 6, 2013**;
 - 19 a. If Plaintiff files a Rule 12 motion, Defendant’s Opposition shall be filed by
20 **September 20, 2013**; Plaintiff’s Reply shall be filed by **September 23, 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 26, 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 26, 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 7. Defendant's Motions (i) to hold Integral in contempt for e.g. altering evidence and (ii) for
- 8 sanctions against Integral for e.g. intentionally misleading the Court
- 9 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 10 b. Plaintiff will file its moving papers by: August 19, 2013
- 11 c. Each brief will be no longer than 15 pages
- 12 8. Defendant's Motions for Summary Judgment
- 13 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 14 b. Plaintiff will file its moving papers by: August 19, 2013
- 15 c. Each brief will be no longer than 25 pages.

16 **IT IS SO STIPULATED**

17 Dated: July 19, 2013

COMPUTERLAW GROUP LLP

18 By: /s/ Jack Russo
Jack Russo

Attorneys for Plaintiff
INTEGRAL DEVELOPMENT CORP.

19 Dated: July 19, 2013

KATTEN MUCHIN ROSENMAN LLP

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

Attorneys for Defendant
VIRAL TOLAT

21 **ATTORNEY ATTESTATION**

22 As required by General Order 45, I attest under penalty of perjury that concurrence in the filing

23 of this document has been obtained from the signatories indicated by a conformed signature (/s/)

24 within this e-filed document. /s/ Jack Russo

25 Jack Russo, Esq.

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:

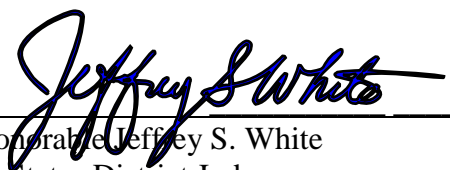
- 4 1. Plaintiff Integral shall file its First Amended Complaint on July ²⁶25, 2013;
- 5 2. Defendant Tolat shall file his Answer and Counterclaims to Integral's First Amended
6 Complaint on August 15, 2013;
- 7 3. Plaintiff shall file its Answer and/or responsive motions to Defendant Tolat's
8 Counterclaims on September 5, 2013;
- 9 a. If Plaintiff files a Rule 12 motion, Defendant's Opposition shall be filed by
10 September 12, 2013; Plaintiff's Reply shall be filed by September 19, 2013;
- 11 4. Any motions filed by Plaintiff Integral pertaining to Defendant Tolat's Counterclaims shall
12 be heard on September 27, 2013, at 9:00 a.m.
- 13 5. Plaintiff's Motion for Sanctions Re: Spoliation and for Contempt
- 14 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 15 b. Plaintiff will file its moving papers by: **July 25, 2013**
- 16 c. Defendant will file any opposition by: August 9, 2013
- 17 d. Plaintiff will file any reply by: August 16, 2013.
- 18 e. Each brief will be no longer than 15 pages
- 19 6. Plaintiff's Motions for Summary Adjudication and for Preliminary Injunction
- 20 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 21 b. Plaintiff will file its moving papers by: **July 25, 2013**
- 22 c. Defendant will file any opposition by: August 9, 2013
- 23 d. Plaintiff will file any reply by: August 16, 2013.
- 24 e. Each brief will be no longer than 25 pages.
- 25 7. Defendant's Motions (i) to hold Integral in contempt for e.g. altering evidence and (ii) for
26 sanctions against Integral for e.g. intentionally misleading the Court
- 27 a. Hearing Date: September 27, 2013 at 9:00 a.m.
- 28 b. Plaintiff will file its moving papers by: August 19, 2013
- c. Defendant will file any opposition by: September 3, 2013
- d. Plaintiff will file any reply by: September 10, 2013.

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- e. Each brief will be no longer than 15 pages
- 8. Defendant's Motions for Summary Judgment
 - a. Hearing Date: September 27, 2013 at 9:00 a.m.
 - b. Plaintiff will file its moving papers by: August 19, 2013
 - c. Defendant will file any opposition by: September 3, 2013
 - d. Plaintiff will file any reply by: September 10, 2013.
 - e. Each brief will be no longer than 25 pages.

IT IS SO ORDERED.

Dated: July 23, 2013



The Honorable Jeffrey S. White
United States District Judge