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JACK RUSSO (State Bar No. 96068)  
CHRISTOPHER SARGENT (State Bar No. 246285)  
COMPUTERLAW GROUP LLP  
401 Florence Street  
Palo Alto, CA 94301  
Telephone: (650) 327-9800  
Facsimile: (650) 618-1863  
E-mail: [jrusso@computerlaw.com](mailto:jrusso@computerlaw.com)  
[csargent@computerlaw.com](mailto:csargent@computerlaw.com)

Attorneys for Plaintiff  
INTEGRAL DEVELOPMENT CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

INTEGRAL DEVELOPMENT CORPORATION,  
a California corporation,

Case No. 3:12-cv-06575-JSW

Plaintiff,

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE CASE  
MANAGEMENT CONFERENCE**

v.

VIRAL TOLAT, an individual,

Defendant.

**JOINT STIPULATION**

WHEREAS, on January 4, 2013, the Court issued an Order Setting Case Management Conference and Requiring Joint Case Management Conference Statement (Dkt. 17), setting the Case Management Conference for April 19, 2013, at 1:30 p.m. in Department 11;

WHEREAS, in the Court's January 10, 2013, Order Denying [Integral's] Ex Parte Application for a Temporary Restraining Order (Dkt. 46), the Court permitted the parties certain expedited discovery, specifically, that reciprocal document discovery be completed by no later than January 31, 2013, depositions to be conducted by no later than February 14, 2013, and private mediation to be completed by no later than March 14, 2013;

WHEREAS, in January, February and March of 2013, the parties exchanged document discovery (over 50,000 pages) and conducted the depositions of eight (8) separate witnesses in California and New York, including Defendant Viral Tolat and Harpal Sandhu (the Chief Executive Officer of Plaintiff Integral Development Corporation);

WHEREAS, the parties are currently meeting and conferring and attempting to informally resolve several discovery disputes, and plan to submit their disputes in Letter Briefs to Magistrate Judge Laurel Beeler in the event that the parties are unable to resolve their differences;

WHEREAS, the parties are in the process of scheduling mediation, anticipated to occur in May of this year and with the goal of the Case Management Conference in June 2013 if the case is not resolved in mediation;

IT IS HEREBY STIPULATED and agreed that, in order to ensure that the Case Management Conference is as efficacious as possible, the parties jointly request that the Court continue the Case Management Conference so that it occurs after the parties' mediation; specifically, the parties request permission to file the Joint Case Management Conference Statement in June 2013 following the scheduled mediation.

**IT IS SO STIPULATED.**

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Dated: April 1, 2013

COMPUTERLAW GROUP LLP

By: /s/ Jack Russo

Jack Russo  
Attorneys for Plaintiff  
INTEGRAL DEVELOPMENT  
CORPORATION

Dated: April 1, 2013

KATTEN MUCHIN & ROSENMAN LLP

By: /s/ Steven Eckhaus

Steven Eckhaus  
Attorneys for Defendant  
VIRAL TOLAT

**ATTORNEY ATTESTATION**

Pursuant to General Order 45, I hereby attest that concurrence in the filing of this document has been obtained from the signatories indicated by a 'conformed' signature (/s/) within this e-filed document.

By: /s/ Jack Russo


Jack Russo  
Attorneys for Plaintiff  
INTEGRAL DEVELOPMENT  
CORPORATION

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWN, the parties' joint request is GRANTED and the Case Management Conference is continued and shall be held on June 14, 2013, with the Joint Case Management Conference Statement to be filed by June 7, 2013.

**IT IS SO ORDERED.**

DATED: April 2, 2013

  
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The Honorable Jeffrey S. White  
United States District Judge