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Attorneys for Non-Party
 Walchem IWAKI America Inc.

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

14
 15 NALCO COMPANY,
 16 Plaintiff,
 17 v.
 18 TURNER DESIGNS, INC.
 19 Defendant.

CASE NO. CV-13-02727 NC
**STIPULATION AND APPLICATION
 FOR ORDER EXTENDING TIME FOR
 HEARING ON PLAINTIFF NALCO'S
 MOTION TO COMPEL NON-PARTY
 WALCHEM TO PRODUCE
 DOCUMENTS SUBPOENAED BY
 NALCO**

Date: ~~PROPOSED~~ Mar. 5, 2014
 Time: 1:00 pm
 Location: Courtroom A, 15th Floor
 Before: Hon. Nathaniel M. Cousins

1 The parties hereby stipulate to and apply for an Order Extending Time for Hearing
2 on Plaintiff Nalco's Motion to Compel Non-Party Walchem to Produce Documents
3 Subpoenaed by Nalco, that would postpone the hearing date by one week to March 5, 2014
4 at 1:00 pm, or to any other date or time that week or later that is convenient for the Court.

5 Pursuant to Civil Local Rule 6-2, Nalco and Walchem state that their basis for
6 seeking a one-week extension of the February 26, 2014 hearing date set by the Court is as
7 follows:

8 1. Walchem requests this order because Nicholas A. Brown, counsel for Walchem,
9 is unavailable on February 26, 2014 at 1:00 pm, the hearing date and time set by the Court.

10 2. There have been no previous time modifications related to Nalco's Motion to
11 Compel; moving the hearing date will not change the briefing schedule set by the Court or
12 reduce the amount of time the Court has to consider the briefing.

13 3. Nalco does not object to or oppose Walchem's request to move the hearing date.

14 4. Walchem and Nalco agree that the requested one-week time extension of the
15 hearing date will not impact the resolution of this dispute.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17
18 DATED: February 14, 2014

GREENBERG TRAURIG, LLP

19 By: /s/ Nicholas A. Brown

20 NICHOLAS A. BROWN
21 STEPHANIE D. AHMAD

22 Attorneys for Non-Party
Walchem IWAKI America Inc.

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25 By: /s/ Whitney E. McCollum

26 BRYAN WILSON
27 WHITNEY E. MCCOLLUM

28 Attorneys for Plaintiff
NALCO COMPANY

1 PURSUANT TO STIPULATION, IT IS ORDERED that the hearing regarding
2 Nalco's Motion To Compel Non-Party Walchem to Produce Documents Subpoenaed by
3 Nalco is re-set to March 5, 2014 at 1:00 pm.

4
5 DATED: February 18, 2014

