

ATTORNEYS FOR DEFENDANT InfoNow Corporation, d/b/a Channelinsight

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ZYME SOLUTIONS, INC.,

Plaintiff,

VS.

INFONOW CORPORATION, d/b/a
CHANNELINSIGHT,

Defendant.

Case Number: C 3:13-cv-04082-WHA

**STIPULATED REQUEST FOR ORDER
CHANGING TIME AND DECLARATION
IN SUPPORT THEREOF**

1 Plaintiff and Counterclaim Defendant Zyme Solutions, Inc. ("Zyme") and Defendant and
2 Counterclaim Plaintiff, InfoNow Corporation, d/b/a Channelinsight ("Channelinsight") hereby
3 file this stipulated request for an order extending certain time frames set in the Patent Local
4 Rules, and the following declaration in support thereof, as required pursuant to Civil Local Rule
5 6-2(a). Among other reasons to seek this extension, lead counsel for Channelinsight will be
6 traveling outside the country at the end of February and beginning of March, when Zyme's
7 disclosures under Patent L.R. 3-3 and 3-4 are due and when deadlines under Patent L.R. 4 begin
8 to arise. To ensure that the parties have adequate time to comply with Patent L.R. 4-1 and 4-2,
9 the parties jointly request a modest extension of the deadline under Patent L.R. 3-3 and 3-4 and
10 all subsequent deadlines timed therefrom. More specifically, the parties request that the deadline
11 for Zyme to serve its Invalidity Contentions (Patent L.R. 3-3) and Document Production
12 Accompanying Invalidity Contentions (Patent L.R. 3-4) be extended from February 24, 2014 to
13 March 10, 2014 and deadlines timed therefrom pursuant to the Patent Local Rules be extended
14 accordingly. No party will be prejudiced because the Case Management Order entered by the
15 Court on December 24, 2013, provides that claim construction in this case will occur during
16 summary judgment or at trial in setting the jury instructions.

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20 There have been no previous time modifications in this matter, nor will the enlargement
21 of time described above affect the deadlines contained in the Court's Case Management Order,
22 dated December 23, 2013. Therefore, the parties request that the Court grant this Stipulated
23 Request for Order Changing Time, pursuant to Civil Local Rule 6-2(b).

1 Dated: February 13, 2014

KUTAK ROCK LLP

2 s/ Chad T. Nitta

3 Jacob Song

4 Chad T. Nitta (appearance pro hac vice)

5 Blair E. Kanis (appearance pro hac vice)

6 Counsel for Plaintiff Zyme Solutions, Inc.

7 Dated: February 13, 2014

SHOEMAKER GHISELLI + SCHWARTZ

8 s/ Andrew R. Shoemaker

9 Jonathan Allan Klein

10 Andrew R. Shoemaker (appearance pro hac
11 vice)

12 Counsel for Defendant InfoNow Corporation,
13 d/b/a Channelinsight

14 All deadlines ordered in the Case Management Order remain
15 in place (Dkt. No. 39).

PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 Dated: February 18, 2014.

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18 UNITED STATES DISTRICT MAGISTRATE JUDGE