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6 Attorneys for Defendant
 and Counter-claimant
 7 Delta Air Lines, Inc.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

12 ALBERT JOHN FREEMAN,

13 Plaintiff,

14 vs.

15 DELTA AIR LINES, INC.,

16 Defendant.

CASE NO: 13-cv-04179-JSW

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

Judge: Hon. Jeffrey S. White
 Courtroom 11. 19th Floor

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 PROFESSIONAL CORPORATION
 ATTORNEYS AT LAW

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

JOINT STIPULATION

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3 WHEREAS, on September 23, 2013, the Court issued an Order Setting Case
4 Management Conference and Requiring Joint Case Management Conference Statement (Dkt. 8),
5 setting the Case Management Conference for December 13, 2013 at 1:30 p.m. in Courtroom 11,
6 19th Floor, Federal Building, 450 Golden Gate Avenue, San Francisco, California;

7
8 WHEREAS Due to a number of outstanding issues, Delta and Plaintiff believe
9 that an adjournment of several weeks would be beneficial to achieving a more productive result
10 at the eventual Case Management Conference. The reason for the request is that Delta has
11 opened settlement discussions with Plaintiff's counsel. Unfortunately, because Plaintiff's
12 principal has been out of the Country, Plaintiff's counsel has not been able to provide Delta with
13 a comprehensive explanation of its infringement claims or relief sought. Accordingly, Delta is
14 unable to determine if an early settlement is feasible or what type of schedule would be optimal
15 under the facts of this case.

16
17 IT IS HEREBY STIPULATED and agreed that, to ensure that the Case
18 Management Conference is as efficacious as possible, the parties request that the Court continue
19 the December 13, 2013 Case Management Conference until at least **the latter part of January**
20 **2014**. This continuance would provide the parties with sufficient time to fully engage in
21 settlement discussions, and position the case for either amicable resolution or a more efficient
22 litigation.

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1 **IT IS SO STIPULATED**

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3 DATED: December 3, 2013.

COMMINS & KNUDSEN, P.C.

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5 By: /s/ David H. S. Commins
6 David H.S. Commins
7 Attorneys for Defendant
8 and Counter-claimant
9 Delta Air Lines, Inc.

10 DATED: December 3, 2013.

JOHN W. CARPENTER

11 By: /s/ John W. Carpenter
12 John W. Carpenter
13 Attorney for Plaintiff
14 Albert John Freeman
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ATTORNEY ATTESTATION

As required by General Order 45, I attest under penalty of perjury 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.


/s/ David H.S. Commins
David H.S. Commins

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWN, the parties' joint request is GRANTED and the December 13, 2013, Case Management Conference is continued and shall be held on January 24, 2014.

IT IS SO ORDERED.

Dated: December 4, 2013.


The Honorable Jeffrey S. White
United States District Judge

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