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7 Attorneys for Plaintiff  
 PINTEREST, INC.  
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10 **IN THE UNITED STATES DISTRICT COURT**  
 11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12  
 13 PINTEREST, INC.,  
 a Delaware corporation,

14  
 15 Plaintiff,

16 v.

17 PINTRIPS, INC.,  
 a Delaware corporation,

18  
 19 Defendant.

20 AND RELATED COUNTERCLAIMS  
 21

Case No. CV 13-04608-RS-KAW

**STIPULATED REQUEST TO HEAR  
 MOTION FOR PROTECTIVE ORDER,  
~~MOTION FOR SANCTIONS,~~ AND JOINT  
 LETTER ON DESIGNATED HOUSE  
 COUNSEL, ON SHORTENED TIME**

**~~[PROPOSED]~~ ORDER**

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Pinterest, Inc. (“Pinterest” or “Plaintiff”)  
2 and Defendant Pintrips, Inc. (“Pintrips” or “Defendant”), through this Stipulated Request to Hear  
3 Motion for Protective Order, Motion for Sanctions, and Joint Letter on Designated House Counsel,  
4 on Shortened Time (“Stipulation”), agree as follows:

5 1. Pinterest has noticed a motion pursuant to Rule 28(b) of the Federal Rules of Civil  
6 Procedure to issue a Letter of Request for the examination of Mr. Paul Addy by deposition under  
7 Article I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial  
8 Matters. That motion has been set for hearing in this Court at 11:00 am on September 4, 2014. (Dkt.  
9 #62)

10 2. Pintrips has noticed a motion for a Protective Order prescribing the manner by which  
11 Pinterest may take discovery from certain non-parties as ordered by this Court on August 7, 2014.  
12 That motion has been set for hearing in this Court at 11:00 am on October 2, 2014. (Dkt. ## 68 and  
13 73) In response to Pintrips’ motion, Pinterest is today filing an Opposition, and a motion for  
14 sanctions. Pintrips has not yet seen Pinterest’s Opposition, or the motion for sanctions, and  
15 accordingly, if the Court grants the parties’ request herein for shortened time, Pintrips requests  
16 Tuesday, September 2 (September 1 being Labor Day) as the date by which to file a Reply to  
17 Pinterest’s Opposition, and an Opposition to the motion for sanctions.

18 3. The parties have filed a Joint Letter concerning the designation by Pinterest of  
19 Anthony Falzone as Designated House Counsel. (Dkt. # 72)

20 4. Under the Court’s Case Management Scheduling Order, non-expert discovery is to  
21 conclude on or before October 3, 2014. (Dkt. # 42)

22 5. The above referenced motions and Joint Letter all involve disputes over non-expert  
23 discovery which the parties hope to resolve as expeditiously as possible, to allow compliance with the  
24 Court’s Case Management Scheduling Order. Accordingly, they have stipulated that along with  
25 Pinterest’s motion to issue a Letter of Request for the examination of Mr. Paul Addy, which is  
26 already scheduled to be heard at 11:00 am on September 4, 2014, Pintrips’ motion for a protective  
27 order and Pinterest’s motion for sanctions should also be heard at that same time and date. The  
28

1 parties also request that the Court permit argument on the parties' Joint Letter on the designation of  
2 Anthony Falzone as Designated House Counsel at that same hearing.

3 6. Neither party has previously requested or received a time modification in this case.  
4 The time modification presently requested will not have any effect on the schedule for this case.  
5

6 Dated: August 27, 2014

Respectfully submitted,

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8 HARVEY SISKIND LLP  
LAWRENCE J. SISKIND  
DONALD A. THOMPSON

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10 By: \_\_\_\_\_ /s/  
11 Lawrence J. Siskind

12 Attorneys for Plaintiff  
13 PINTEREST, INC.

14 Dated: August 27, 2014

KENYON & KENYON LLP

15  
16 By: \_\_\_\_\_ /s/  
17 Frank L. Bernstein

18 Attorneys for Defendant  
19 PINTRIPS, INC.

20  
21 I, Lawrence J. Siskind, am the ECF User whose identification and password are being used to  
22 file this document. Pursuant to Civil Local Rule 5.1, I hereby attest that counsel for Defendant has  
23 concurred in this filing.

24  
25 \_\_\_\_\_ /s/

26 Lawrence J. Siskind  
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1 PURSUANT TO STIPULATION, THE COURT HEREBY ORDERS AS FOLLOWS.

2 The Court will hear the following matters on September 4, 2014:

3 Pinterest's motion for a letter of request, Dkt. No. 57.

4 The parties' joint letter concerning Pinterest's designation of Anthony Falzone as designated  
5 house counsel under the parties' stipulated protective order, Dkt. No. 72.

6 Pintrips' motion for a protective order, Dkt. No. 73.

7 Pinterest's motion for sanctions shall be re-noticed for hearing according to Civil Local Rule  
8 7-2. See Civil L.R. 37-4. The Court will not hear the motion on shortened time.

9 Furthermore, the Court orders the parties to meet and confer to discuss creative solutions for  
10 conducting the deposition at issue in Pinterest's motion for a letter of request. To the extent that  
11 Pintrips is concerned about the costs of defending such a deposition, the parties shall discuss whether  
12 expenses may be minimized by using available technology.

13 **IT IS SO ORDERED.**

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15  
16 Dated: August 29, 2014



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18 **THE HONORABLE KANDIS A. WESTMORE**  
19 **UNITED STATES MAGISTRATE JUDGE**