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Omar Jabbour, Esq. (SBN 214784)
Julie I. Vinogradsky, Esq. (SBN 267299)
Amaze Holding Corporation
550 15th Street, Suite 21
San Francisco, CA 94103

Attorneys for Plaintiff
ONE PICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ONE PICA, INC., a Massachusetts
Corporation,

Plaintiff,

v.

RACING THE PLANET, LTD., a Hong
Kong Local Limited Company,

Defendant.

RACING THE PLANET, LTD., a Hong
Kong Local Limited Company,

Counterclaimant,

v.

ONE PICA, INC., a Massachusetts
Corporation,

Counterdefendant.

Case No. 3:13-cv-05679 NC

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
WITHDRAW DEFENDANT AND
COUNTERCLAIMANT
RACINGTHEPLANET LIMITED'S
SPECIAL MOTION TO STRIKE
PLAINTIFF AND
COUNTERDEFENDANT ONE PICA,
INC.'S DEFAMATION AND TRADE
LIBEL CLAIMS AND AWARDED
ATTORNEYS' FEES.**

Hon. Nathanael Cousins

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Plaintiff and Defendant (collectively, the “Parties”), by and through their respective
3 counsel, hereby stipulate to the following and ask the Court to enter the Proposed Order as set
4 forth below:

- 5 1. On March 13, 2014, the Parties filed a joint stipulation to continue the initial Case
6 Management Conference to April 23, 2014 because the Parties had been engaged in
7 settlement discussions.
- 8 2. On March 13, 2014, the Court granted the Parties’ joint stipulation and set the initial
9 Case Management Conference for April 23, 2014 at 1:00 p.m.
- 10 3. On April 14, 2014, the Parties executed a binding settlement term sheet and are
11 currently in the process of drafting a final settlement agreement that will result in a
12 complete dismissal of all claims and counterclaims in this action.
- 13 4. Pursuant to the terms of the binding settlement term sheet, Defendant
14 RacingThePlanet, Limited withdraws Defendant and Counterclaimant
15 RacingThePlanet Limited’s Special Motion to Strike Plaintiff and Counterdefendant
16 One Pica, Inc.’s Defamation and Trade Libel Claims and Request for an Award of
17 Attorneys’ Fees.
- 18 5. The Parties jointly request that the initial Case Management Conference be
19 continued to May 28, 2014 at 10:00 a.m to provide time for the parties to finalize
20 their settlement and dismiss the case; and
- 21 6. The Parties jointly request that Defendant and Counterclaimant RacingThePlanet
22 Limited’s Special Motion to Strike Plaintiff and Counterdefendant One Pica, Inc.’s
23 Defamation and Trade Libel Claims and Request for an Award of Attorneys’ Fees be
24 withdrawn, and the hearing scheduled for April 23, 2014 be taken off the Court’s
25 calendar.

26
27 IT IS HEREBY STIPULATED, by and between the parties through their respective
28 counsel, that: (1) the initial Case Management Conference shall be continued to May 28, 2014 at

1 10:00 a.m.; and (2) Defendant and Counterclaimant RacingThePlanet Limited's Special Motion
2 to Strike Plaintiff and Counterdefendant One Pica, Inc.'s Defamation and Trade Libel Claims
3 and Request for an Award of Attorneys' Fees, shall be withdrawn, and the hearing scheduled for
4 April 23, 2014 be taken off the Court's calendar.

5
6 **IT IS SO STIPULATED.**

7
8 Dated: April 16, 2014

HOGAN LOVELLS US LLP

9 By: /s/ Clark S. Stone
10 Clark S. Stone
11 Attorneys for Defendant
12 RACINGTHEPLANET LIMITED

13
14
15 Dated: April 16, 2014

AMAZE HOLDING CORPORATION

16 By: /s/ Omar Jabbour
17 Omar Jabbour
18 Attorneys for Plaintiff
19 ONE PICA, INC.

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ATTESTATION

I, Omar Jabbour, am the ECF user whose identification and password are being used to file the instant document. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all counsel whose electronic signatures appear above provided their authority and concurrence to file this document.

/s/ Omar Jabbour
Attorney for One Pica, Inc.

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS THE ORDER OF THIS COURT that: (1) the initial Case Management Conference shall be continued to May 28, 2014 at 10:00 a.m.; (2) Defendant and Counterclaimant RacingThePlanet Limited's Special Motion to Strike Plaintiff and Counterdefendant One Pica, Inc.'s Defamation and Trade Libel Claims and Request for an Award of Attorneys' Fees, shall be withdrawn, and the hearing scheduled for April 23, 2014 be taken off the Court's calendar.

IT IS SO ORDERED.

Dated: April 16, 2014

