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19 **UNITED STATES DISTRICT COURT**  
 20 **NORTHERN DISTRICT OF CALIFORNIA**  
 21 **SAN FRANCISCO DIVISION**

22 ROBERT BOSCH HEALTHCARE )  
 SYSTEMS, INC., )

23 Plaintiff, )

24 v. )

25 CARDIOCOM LLC, )

26 Defendant. )

CASE NO. 3:14-cv-01575-EMC  
 JOINT STIPULATION TO EXTEND  
 TIME TO RESPOND TO MOTION TO  
 LIFT STAY AND CONTINUE  
 HEARING DATE FOR MOTION AND  
 CASE MANAGEMENT CONFERENCE

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Robert Bosch Healthcare Systems, Inc.  
2 (“Bosch”) and Defendant Cardiocom, LLC (“Cardiocom”) hereby submit this Joint Stipulation to  
3 Extend Time to Respond to Motion to Lift Stay and Continue Hearing Date for Motion and Case  
4 Management Conference. The parties stipulate that Cardiocom’s response brief to Bosch’s Motion  
5 to Lift Stay (Dkt. 171) may be extended from January 12, 2017 to January 19, 2017. As the motion  
6 was filed during the holidays, Cardiocom requested, and Bosch granted, an additional week to allow  
7 a full and proper response.

8 The hearings for Bosch’s Motion to Lift Stay and the Case Management Conference are  
9 currently scheduled for February 2, 2017 at 1:30. (Dkts. 171 and 173.) The parties stipulate and  
10 request that the Court continue the Case Management Conference to February 23, 2017 in order to  
11 accommodate a prior conflict of Cardiocom’s lead Counsel, Daniel McDonald of the Merchant &  
12 Gould firm.

13 The requested continuance shall not otherwise affect scheduling issues for the case. No  
14 previous extension of this deadline has been requested or granted.

15 IT IS SO STIPULATED, through counsel of record:

16 DATED: January 6, 2017

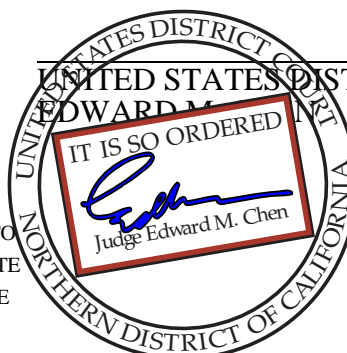
17 /s/ Bas de Blank  
18 Counsel for Plaintiff Robert Bosch Healthcare  
19 Systems, Inc.

20 DATED: January 6, 2017

21 /s/ Adam Alper  
22 Counsel for Defendant Cardiocom, LLC

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED** that Cardiocom, LLC shall have  
24 until January 19, 2017 to file an opposition to Bosch’s Motion to Lift Stay (Dkt. 171) and the  
25 hearings for that motion and the Case Management Conference are continued to February 23, 2017.

26 Dated: 1/9/17



JOINT STIPULATION TO EXTEND TIME TO RESPOND TO  
MOTION TO LIFT STAY AND CONTINUE HEARING DATE  
FOR MOTION AND CASE MANAGEMENT CONFERENCE

CASE No. 3:14-cv-01575-EMC



1 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
2 is true and correct. Executed on January 6, 2017 at Minneapolis, MN.

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4 /s/ William Schultz  
5 William Schultz  
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1 **ATTESTATION OF CONCURRENCE IN FILING**

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3 I Adam Alper, am the ECF User whose identification and password are being used to file this

4 Joint Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Bas De Blank of

5 Orrick, Herrington & Sutcliffe LLP has concurred in this filing.

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7 DATED: January 6, 2017

8 /s/ Adam Alper

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2017, a copy of the foregoing document is being electronically filed with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/Adam Alper \_\_\_\_\_

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