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13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 ADOBE SYSTEMS INCORPORATED, a
 16 Delaware Corporation,
 17 Plaintiff,
 18 v.
 19 METROTECH SOLUTIONS USA INC., a
 Delaware Corporation; 9199-6546 QUEBEC
 20 INC., a Canadian Quebecois Corporation
 doing business as METROTECH
 21 SOLUTIONS INC., METROTECH
 SOLUTIONS and METROTECH; and DOES
 22 2-10, Inclusive,
 23 Defendants.

Case No.: 3:14-cv-04871-EMC

**SECOND STIPULATION TO
 CONTINUE HEARING AND BRIEFING
 SCHEDULE ON PLAINTIFF’S MOTON
 FOR CONTEMPT AND [PROPOSED]
 ORDER**

24 Plaintiff ADOBE SYSTEMS INCORPORATED (“Plaintiff”), by and through its counsel
 25 of record, and Defendants METROTECH SOLUTIONS USA INC.; 9199-6546 QUEBEC INC.,
 26 d/b/a METROTECH SOLUTIONS INC., METROTECH SOLUTIONS and METROTECH;
 27 9188-0047 QUEBEC INC. d/b/a UKTECH STORE; and 9199-6587 QUEBEC INC. d/b/a IT
 28

1 FACTORY (collectively “Defendants”), by and through their counsel of record, hereby stipulate
2 and agree as follows:

3 **RECITALS**

4 On August 20, 2015, the Court entered a PERMANENT INJUNCTION AGAINST DEFENDANTS
5 AND DISMISSAL WITH PREJUDICE (D.E. 31) (“Injunction”).

6 On June 1, 2017, Plaintiff filed its MOTION FOR CONTEMPT AND SANCTIONS AGAINST THE
7 ENJOINED PARTIES (D.E. 33) (“Motion”), asserting that Defendants violated the Injunction by
8 dealing in Adobe products, specifically through their illegal distribution of unbundled (and in
9 one instance, previously activated) Adobe software products.

10 On June 14, 2017, the Parties filed a STIPULATION TO CONTINUE HEARING AND BRIEFING
11 SCHEDULE ON PLAINTIFF’S MOTION FOR CONTEMPT (D.E. 35) (“First Stipulation”) in order to
12 allow the Parties time to resolve the issues addressed in the Motion.

13 On June 15, 2017, the Court granted the Parties’ First Stipulation and continued the
14 hearing on the Motion to August 3, 2017, with response dates adjusted accordingly.

15 Thereafter, Defendants produced certain documents to Plaintiff in an effort to resolve
16 Plaintiff’s claims, and the Parties have been working towards resolution of the issues contained
17 in the Motion. The Parties, however, need additional time to pursue such a resolution.

18 **AGREEMENT**

19 Accordingly, Plaintiff and Defendants hereby stipulate and respectfully request the Court
20 continue the hearing on the Motion to August 24, 2017, or a date thereafter acceptable to the
21 Court.

22 Additionally, Plaintiff and Defendants hereby stipulate and respectfully request that
23 Defendants’ response to the Motion be due on or before August 3, 2017.

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1 Plaintiff and Defendants hereby stipulate and respectfully request that Plaintiff's reply
2 shall be due on or before August 10, 2017.

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4 DATED: July 7, 2017

JOHNSON & PHAM, LLP

5 By: /s/ Nicole Drey Huerter
6 Nicole Drey Huerter, Esq.
7 Attorneys for Plaintiff
8 ADOBE SYSTEMS INCORPORATED

9 DATED: July 7, 2017

LAW OFFICES OF GEORGE A. SHOJET,
A PROF. CORP.

10
11 By: /s/ George A. Shojet
12 Pierre Francis
13 Attorney for Defendants
14 METROTECH SOLUTIONS USA INC.; 9199-
15 6546 QUEBEC INC., d/b/a METROTECH
16 SOLUTIONS INC., METROTECH SOLUTIONS
17 and METROTECH; 9188-0047 QUEBEC INC.
18 d/b/a UKTECH STORE; and 9199-6587 QUEBEC
19 INC. d/b/a IT FACTORY

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

21 Pursuant to Stipulation, the hearing on Plaintiff's MOTION FOR CONTEMPT AND
22 SANCTIONS AGAINST THE ENJOINED PARTIES ("Motion") is reset from August 3, 2017, to
23 August 24, 2017. Defendants' response to the Motion is due three (3) weeks prior
24 to the hearing date. Plaintiff's reply to the Motion is due two (2) weeks prior to the hearing date.

25 IT IS SO ORDERED.

26 DATED: July 11, 2017

