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12 Attorney for Defendants

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

**STIPULATION TO EXTEND  
 DEADLINE TO COMPLETE  
 MEDIATION**

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

3 **RECITALS**

4 On August 24, 2017, the Court ordered the Parties to complete mediation by no later than  
5 November 22, 2017 (D.E. 48).

6 On September 22, 2017, the ADR office appointed Linda Joy Kattwinkel, Esq., to serve  
7 as mediator.

8 The mediator and the Parties then arranged for mediation to take place on November 13,  
9 2017.

10 On October 13, 2017, the mediator alerted the Parties that she had developed a conflict  
11 that required her to be out of town that week and that the mediation would need to be  
12 rescheduled.

13 There is no date prior to the current mediation deadline of November 22, 2017, that is  
14 available for the mediator, all Parties, and their counsel. Instead, the date of December 12, 2017,  
15 has been confirmed to reschedule the mediation.

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1 AGREEMENT

2 Accordingly, Plaintiff and Defendants hereby stipulate and respectfully request the Court  
3 extend the mediation deadline to December 15, 2017, and delay ruling on Plaintiff’s pending  
4 Motion for Contempt until sometime thereafter. The Parties shall submit a joint report regarding  
5 mediation by no later than December 22, 2017.

6 DATED: November 13, 2017

JOHNSON & PHAM, LLP

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

11 DATED: November 13, 2017

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

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

22 ~~PROPOSED~~ ORDER

23 Pursuant to Stipulation, the deadline for mediation is extended to December 15, 2017.  
24 The Parties shall submit a joint regarding the mediation by no later than December 22, 2017.

25 IT IS SO ORDERED. Further CMC reset from 12/7/17 to 1/18/18  
26 at 10:30 a.m. An update joint CMC statement  
27 due 1/11/18.

28 DATED: 11/16/17

HON. EDWARD M. CHEN  
United States District Court  
Northern District of California

