

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KILPATRICK TOWNSEND & STOCKTON LLP
Jon Michaelson (SBN 83815)
jmichaelson@kilpatricktownsend.com
Scott Kolassa (State Bar No. 294732)
skolassa@kilpatricktownsend.com
Frances B. Cox (State Bar No. 133696)
ncox@kilpatricktownsend.com
1080 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 326-2400
Facsimile: (650) 326-2422

TURNER BOYD LLP
Karen I. Boyd (SBN 189808)
boyd@turnerboyd.com
Jennifer Seraphine (SBN 245463)
seraphine@turnerboyd.com
Zhuanjia Gu (SBN 244863)
gu@turnerboyd.com
702 Marshall Street, Suite 640
Redwood City, CA 94063
Telephone: (650) 521-5930
Facsimile: (650) 521-5931

KILPATRICK TOWNSEND & STOCKTON LLP
Darius C. Samerotte (SBN 296252)
dsamerotte@kilpatricktownsend.com
Holly Gaudreau (SBN 209114)
hgaudreau@kilpatricktownsend.com
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
Telephone: (415) 576-0200
Facsimile: (415) 576-0300

Attorneys for Defendants
REARDEN, LLC, REARDEN MOVA, LLC,
MO2, LLC, and MOVA, LLC.

Attorneys for Plaintiff and Counterclaim Defendant
VIRTUE GLOBAL HOLDINGS LIMITED and
Counterclaim Defendant SHENZHENSHI
HAITIECHENG SCIENCE AND TECHNOLOGY
CO., LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VIRTUE GLOBAL HOLDINGS LIMITED,
Plaintiff,

v.

REARDEN, LLC, REARDEN MOVA, LLC,
MO2, LLC, and MOVA, LLC,

Defendants and
Counterclaim Plaintiffs,

v.

SHENZHENSHI HAITIECHENG SCIENCE
AND TECHNOLOGY CO., LTD.,

Counterclaim Defendant.

Case No. 3:15-cv-00797-JST (SK)

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO COMBINE
CASE MANAGEMENT
CONFERENCE AND MOTION
HEARING DATES**

Judge: Honorable Jon S. Tigar

1 The Parties through their respective attorneys of record respectfully request that the court
2 combine the Case Management Conference, currently scheduled for August 3, 2016, at 2:00 p.m.,
3 and the hearings on Defendants' Motion to Set Aside Order Substituting Parties, Motion for
4 Clarification of Bifurcation Order, and Motion for Order to Show Cause, all currently scheduled for
5 August 4, 2016, at 2:00 p.m. Given the close proximity of the two hearing dates, the Parties request
6 the Court conduct both the CMC and the motion hearings on Thursday, August 4, 2016, at 2:00 p.m.

7
8
9 Dated: July 25, 2016

Respectfully submitted,

10
11 By /s/ Scott E. Kolassa

12 Jon Michaelson (SBN 83815)
13 jmichaelson@kilpatricktownsend.com
14 Scott E. Kolassa (SBN 294732)
15 skolassa@kilpatricktownsend.com
16 Frances B. Cox (SBN 133696)
17 ncox@kilpatricktownsend.com
18 KILPATRICK TOWNSEND & STOCKTON LLP
19 1080 Marsh Road
20 Menlo Park, CA 94025
21 Telephone: 650 326 2400

22 *Attorneys for Plaintiff and Counterclaim*
23 *Defendant*

24 VIRTUE GLOBAL HOLDINGS LIMITED and
25 Counterclaim Defendant SHENZHENSHI
26 HAITIECHENG SCIENCE AND
27 TECHNOLOGY CO., LTD.

By /s/ Karen I Boyd

Karen I. Boyd (SBN 189808)
boyd@turnerboyd.com
Jennifer Seraphine (SBN 245463)
seraphine@turnerboyd.com
Zhuanjia Gu (SBN 244863)
gu@turnerboyd.com
TURNER BOYD LLP
702 Marshall Street, Suite 640
Redwood City, California 94063
Telephone: (650) 521-5930

Attorneys for Defendants
REARDEN LLC, REARDEN MOVA LLC,
MO2 LLC, and MOVA LLC


28
ATTESTATION REGARDING SIGNATURES

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that I have on file permission to sign for plaintiff's counsel indicated by a conformed signature within this e-filed document.

/s/ Karen I. Boyd

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3 Dated: July 25, 2016

4
5 
6 THE HONORABLE JOE S. TIGAR
7 UNITED STATES DISTRICT COURT

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28