

1 KILPATRICK TOWNSEND & STOCKTON LLP
 JON MICHAELSON (SBN 83815)
 2 jmichaelson@kilpatricktownsend.com
 SCOTT KOLASSA (SBN 294732)
 3 skolassa@kilpatricktownsend.com
 FRANCES B. COX (SBN 133696)
 4 ncox@kilpatricktownsend.com
 1080 Marsh Road
 5 Menlo Park, CA 94025
 Telephone: 650 326 2400 / Facsimile: 650 326 2422

6 KILPATRICK TOWNSEND & STOCKTON LLP
 7 HOLLY GAUDREAU (SBN 209114)
 hgaudreau@kilpatricktownsend.com
 8 BENJAMIN M. KLEINMAN-GREEN (SBN 261846)
 bkleinman-green@kilpatricktownsend.com
 9 Two Embarcadero Center, Suite 1900
 San Francisco, CA 94111
 10 Telephone: 415 576 0200 / Facsimile: 415 576 0300

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

13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

17 SHENZHENSHI HAITIECHENG
 SCIENCE AND TECHNOLOGY CO., LTD.,
 18 a People's Republic of China corporation,

19 Plaintiff,

20 and

VIRTUE GLOBAL HOLDINGS LIMITED,
 21 a business company incorporated in the
 British Virgin Islands,

22 Intervenor,

23 v.

24 REARDEN, LLC, a California Limited
 Liability Company; REARDEN MOVA,
 25 LLC, a California Limited Liability
 Company; MO2, LLC, a California Limited
 Liability Company; and MOVA, LLC, a
 26 California Limited Liability Company,

27 Defendants.
 28

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

**STIPULATION AND ~~PROPOSED~~
 ORDER RE TRIAL EXHIBITS
 INVOLVING ALAN KALIN**

Date: December 5, 2016
 Time: 8:30 a.m.
 Location: Courtroom 15, 18th Floor
 Honorable Jon S. Tigar

Action Filed: February 20, 2015



1 Intervenor Virtue Global Holdings Limited (“VGH”) and Defendants (collectively, the
2 “parties”), by and through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, Defendants have made objections to VGH entering and using at trial exhibits
4 reflecting email and email chains principally between and among Greg LaSalle, Steven Perlman
5 and former Bingham attorney Alan Kalin, specifically PTX Nos. 29-33, 35-36, 38, 59 and 82-93;

6 WHEREAS, VGH has issued a trial subpoena for Alan Kalin to appear to testify so as to
7 overcome the objections raised by Defendants as to use of these trial exhibits;

8 WHEREAS, Defendants also wish to enter as trial exhibits correspondence principally
9 between and among Greg LaSalle, Steven Perlman and former Bingham attorney Alan Kalin,
10 specifically DTX Nos. 369-387; and

11 WHEREAS, the parties believe it would save time and be helpful if they avoid requiring
12 Alan Kalin to testify;

13 THEREFORE, the parties request permission of the court to enter the following stipulated
14 order:

15 1. The emails or email chains, as well as attachments thereto, reflected in PTX Nos. 29-33,
16 35-36, 38, 59 and 82-93, and DTX Nos. 369-387 are authentic copies of what they purport to be
17 on their face;

18 2. Alan Kalin sent, received, and/or was copied on each of these emails or email chains,
19 on or about the date(s) indicated therein, and the content of the messages contained therein was
20 conveyed in the manner indicated therein; and

21 3. No party objects to admission and use of the portions of these emails and email chains
22 that constitute communications between or among Greg LaSalle, Steven Perlman, and/or Alan
23 Kalin as evidence on any grounds, including hearsay.

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DATED: December 3, 2016 Respectfully submitted,
KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ Jon Michaelson
JON MICHAELSON
Attorneys for Intervenor,
Virtual Global Holdings, Inc.

DATED: December 3, 2016 TURNER BOYD LLP

By: /s/ Karen I. Boyd
KAREN I. BOYD
Attorneys for Defendants REARDEN, LLC,
REARDEN MOVA, LLC, MO2, LLC, and
MOVA, LLC

IS IT SO ORDERED.

DATED: December 5, 2016



JON S. TIGAR
United States District Court Judge

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), Jon Michaelson hereby attests that the concurrence in the filing of this document has been obtained from the other signatories, which shall serve in lieu of their signatures.

/s/ Jon Michaelson
Jon Michaelson

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