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At the May 29, 2015 Case Management Conference, as confirmed in the minute entry that issued following that conference (Dkt. No. 28), the Court set the hearing on Defendants' Motion for Summary Judgment for August 28, 2015. The Court also approved the schedule set forth in the parties' Joint Case Management Statement (Dkt. No. 26), where the parties agreed to the following schedule for briefing:

	May 22, 2015 Joint Case Management Statement, p. 13
Plaintiff's Opposition to Defendant's Motion for Summary Judgment	July 31, 2015
Defendants' Reply in Support of its Motion for Summary Judgment	August 14, 2015

Defendants served Plaintiff with Defendants' Motion for Summary Judgment on Defendants' Counterclaim for Declaratory Relief on June 1, 2015, and filed that motion on June 10, 2015. (Dkt. No. 35.) Pursuant to Local Rule 6-1(b), Plaintiff Shenzhenshi Haitiecheng Science And Technology Co., Ltd. and Defendants Rearden LLC; Rearden Mova, LLC, MO2, LLC, Mova, LLC, by and through their respective attorneys, hereby stipulate to extend the deadline to file an opposition and reply to Defendants' Motion for Summary Judgment on Defendants' Counterclaim for Declaratory Relief to the dates they agreed upon in their Joint Case Management Statement.

	Current deadline in ECF	Proposed deadline (per the parties' May 22, 2015 Joint Case Management Statement)
Plaintiff's Opposition to Defendant's Motion for Summary Judgment	June 24, 2015	July 31, 2015
Defendants' Reply in Support of its Motion for Summary Judgment	July 1, 2015	August 14, 2015

The parties respectfully request an order pursuant to this stipulation.

1	Dated: July 14, 2015	KILPATRICK TOWNSEND & STOCKTON LLP	
2	B _V .	/s/ Frances B. Cox	
3	By.	JON MICHAELSON SCOTT E. KOLASSA	
4		FRANCES B. COX	
5		Attorneys for Plaintiff SHENZHENSHI HAITIECHENG SCIENCE	
6		AND TECHNOLOGY CO., LTD.	
7			
8	Dated: July 14, 2015	DURIE TANGRI LLP	
9	By:	/s/Zac A. Cox	
10 11		RAGESH K. TANGRI JOSEPH C. GRATZ ZAC A. COX	
12		Attorneys for Defendants	
13		REARDEN, LLC, REARDEN MOVA, LLC, MO2, LLC, MOVA, LLC	
14		,	
15		S DISTRA	
16	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
17	Dated: 07/17/2015		
18		E Carried States	
19		Judge Samuel Conti	
20		Judge Samuel Com	
21			
22		DISTRICTOR	
23			
24 25			
26			
27			
28			
		3	
	STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME / CASE NO. 3:15-CV-00797-SC		