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14 *Attorneys for Defendants*

15 REARDEN LLC, REARDEN MOVA LLC,
 16 MO2 LLC, MOVA LLC

17 **UNITED STATES DISTRICT COURT**
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 19 **SAN FRANCISCO DIVISION**

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

22 Plaintiff,

23 v.

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

27 Defendants.
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Case No. 3:15-cv-00797

**STIPULATION AND JOINT MOTION TO
 SUBSTITUTE PARTY AND ~~PROPOSED~~
 ORDER**

1 1. Pursuant to Fed. R. Civ. P. 15(a) and Fed. R. Civ. P. 25(c), Shenzhenshi
2 Haitiecheng Science and Technology Co., Ltd. (“SHST”) and Virtue Global Holdings Ltd.
3 (“Virtue Global”) desire to amend the case caption to reflect Virtue Global’s new status as
4 plaintiff in this action and to substitute parties accordingly.

5 2. Plaintiff’s counsel represents that since this action was filed, former plaintiff in this
6 action SHST transferred all of its interest in the MOVA Assets at issue in this case to Virtue
7 Global.

8 3. Based on this representation, Defendants agree to substitution of Virtue Global as
9 Plaintiff in this case. All rights and defenses with respect to any and all claims asserted by former
10 plaintiff SHST are reserved and shall apply equally as against Virtue Global.

11 4. The parties further agree that SHST shall remain in the case as Counterclaim
12 Defendant, and that all counterclaims presently asserted by Defendants against SHST shall
13 continue as though pleaded against both Counterclaim Defendant SHST and plaintiff Virtue
14 Global. This shall include the counterclaims stayed by this Court’s Order Staying Obligation of
15 Plaintiff to Respond to Defendants’ Amended Counterclaims, ECF No. 86. Defendants reserve
16 the right to assert additional counterclaims against Counterclaim Defendant SHST and plaintiff
17 Virtue Global.

18 5. The parties agree that the substitution of Virtue Global for SHST will not be a basis
19 on which SHST may object to discovery relating to ownership issues.

20 6. No prejudice results from substitution of the party plaintiff because the Court has
21 not “even set a trial date yet.” Transcript of Proceedings before Judge Tigar on March 2, 2016 at
22 8:20. Virtue Global and SHST agree not to seek additional time in the schedule based on the
23 substitution of Virtue Global as Plaintiff.

24 In accordance with the foregoing,

25 IT IS HEREBY STIPULATED by the parties that the case caption be amended to reflect
26 Virtue Global’s new capacity as plaintiff and to identify SHST as a Counterclaim Defendant, and
27 that the Court order a substitution of parties relative thereto.

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Respectfully submitted,
KILPATRICK TOWNSEND & STOCKTON LLP

DATED: March 18, 2016

By: /s/ Scott E. Kolassa
Jon Michaelson
Scott E. Kolassa
Frances B. Cox

Attorneys for Plaintiff SHENZHENSHI
HAITIECHENG SCIENCE AND TECHNOLOGY
CO., LTD.

TURNER BOYD LLP

DATED: March 18, 2016

By: /s/ Jennifer Seraphine
Karen I. Boyd
Jennifer Seraphine
Zhuanjia Gu

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

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1 **~~PROPOSED~~ ORDER**

2 PURSUANT TO STIPULATION, IT IS ORDERED that Virtue Global Holdings Limited
3 is substituted as plaintiff in place of Shenzenshi Haitecheng Science and Technology Co., Ltd, that
4 the case caption may be amended accordingly and to identify Shenzenshi Haitecheng Science and
5 Technology Co., Ltd. as a Counterclaim Defendant as follows:

6
7 VIRTUE GLOBAL HOLDINGS LIMITED,
8 a business company incorporated in the
9 British Virgin Islands,

10 Plaintiff,

11 v.

12 REARDEN, LLC, a California Limited
13 Liability Company; REARDEN MOVA,
14 LLC, a California Limited Liability
15 Company; MO2, LLC, a California Limited
16 Liability Company; and MOVA, LLC, a
17 California Limited Liability Company,

18 Defendants/Counterclaim Plaintiffs,

19 v.

20 SHENZHENSHI HAITIECHENG SCIENCE
21 AND TECHNOLOGY CO., LTD., a People's
22 Republic of China corporation,

23 Counterclaim Defendant.

Case No. 3:15-cv-00797

24 **IT IS SO ORDERED.**

25 Dated: March 21, 2016

