

1 Daniel S. Mount (Cal. Bar No. 77517)
 Jing H. Cherng (Cal. Bar No. 265017)
 2 Mount Spelman, P.C.
 RiverPark Tower, Suite 1650
 3 333 West San Carlos Street
 San Jose CA 95110-2740
 4 Phone: (408) 279-7000
 5 Fax: (408) 998-1473
 Email: dmount@mount.com; gcherng@mount.com
 6

7 Larisa Migachyov (Cal. Bar No. 264669)
 Law Offices of Larisa Migachyov
 8 Post Office Box 2061
 San Francisco, California 94126-2061
 9 Tel.: 650.218.5480
 Email: larisa@lvmpatents.com
 10

11 Counsel for SMARTDATA S.A.

U.S. District Court
 Northern District of California

12 SMARTDATA S.A.

Case No. 3:15-cv-01282-SI

13 Plaintiff

**Stipulated Request and ~~Proposed~~ Order to
 Extend Briefing Deadlines**

14 v.

15 Amazon.com, Inc.

16 Defendants
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MOUNT, SPELMAN & FINGERMAN, P.C.
 RIVERPARK TOWER, SUITE 1650
 333 WEST SAN CARLOS STREET
 SAN JOSE, CALIFORNIA 95110-2740
 TELEPHONE (408) 279-7000

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1 Pursuant to Civil L.R.6-2, and 7-12, Plaintiff SmartData S.A. and Defendant Amazon.com,
2 Inc. request that the Court extend the briefing deadlines for Amazon's pending motion for attorney's
3 fees by one week. Currently SmartData's deadline to oppose the motion is October 16, 2015, and
4 Amazon's deadline to reply is October 23, 2015. The requested extension extends SmartData's
5 opposition deadline to October 23, 2015, and Amazon's reply deadline to October 30, 2015. The
6 requested extension would not affect the hearing, set for November 20, 2015.

7 The parties thrice agreed to extend Amazon's time to respond to the complaint, Docket Nos.
8 7, 11, 16, and filed three stipulated requests to continue the initial case management conference. See
9 Docket Nos. 13, 17, and 19. The current requested extension would not affect the schedule for the
10 case, as the hearing is set for November 20, and briefing would be completed by October 30th under
11 the extended deadlines.

12 Date: October 15, 2015

13 _____
14 /s/ Jing Hong Cherng

15 Mount Spelman P.C.
16 RiverPark Tower, Suite 1650
17 333 West San Carlos Street
18 San Jose CA 95110-2740

19 Law Offices of Larisa Migachyov
20 Post Office Box 2061
21 San Francisco, California 94126-2061
22 Counsel for SMARTDATA S.A.

23 _____
24 /s/ Michael J. Bettinger


25 SIDLEY AUSTIN LLP
26 555 California Street, Suite 2000
27 San Francisco, California 94104

28 Counsel for AMAZON.COM, INC.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 SmartData's deadline to file its opposition to Amazon's pending motion is continued to
3 October 23, 2015. Amazon's deadline to file a reply brief is continued to October 30, 2015.

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5 Date: 10/15/15



6 Hon. Susan Illston
7 United States District Judge

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12 MOUNT, SPELMAN & FINGERMAN, P.C.
13 RIVERPARK TOWER, SUITE 1650
14 333 WEST SAN CARLOS STREET
15 SAN JOSE, CALIFORNIA 95110-2740
16 TELEPHONE (408) 279-7000
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SAN JOSE, CALIFORNIA 95110-2740
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11 Counsel for SMARTDATA S.A.

U.S. District Court
Northern District of California

12 SMARTDATA S.A.

Case No. 3:15-cv-01282-SI

13
14 Plaintiff

**Declaration of Jing Cherng in Support of
Stipulated Request**

15 v.
16

17 Amazon.com, Inc.

18 Defendants

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1 I, Jing Hong Cherng, declare:

2 1. I am an attorney at the law firm of Mount, Spelman P.C., counsel of record for
3 SmartData, S.A. I have personal knowledge of the facts in this declaration.

4 2. SmartData requests an extension of its opposition deadline by one week to allow it to
5 fully address Amazon's pending motion for sanctions.

6 3. The parties thrice agreed to extend Amazon's time to respond to the complaint,
7 Docket Nos. 7, 11, 16, and filed three stipulated requests to continue the initial case management
8 conference. See Docket Nos. 13, 17, and 19.

9 4. The current requested extension would not affect the schedule for the case, as the
10 hearing is set for November 20, and briefing would be completed by October 30th under the extended
11 deadlines.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed in San Jose,
13 California on the date set forth below.

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16 Date: October 15, 2015

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18 /s/ Jing Hong Cherng
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