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26 Attorneys for Plaintiff  
 27 TANGLE INC.

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

29 TANGLE INC., 30 31 Plaintiff, 32 33 V. 34 35 MAGIC TIME INTERNATIONAL LTD.; and 36 BROWN SALES & MARKETING LLC 37 38 Defendants.
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Case No.: 3:15-cv-2802-WHO

**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE  
 DATE AND EARLY NEUTRAL  
 EVALUATION DEADLINE**

STIPULATION TO CONTINUE  
 CASE MANAGEMENT CONFERENCE DATE  
 AND EARLY NEUTRAL EVALUATION  
 DEADLINE

CASE NO.: 3:15-CV-2802-WHO

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2 Plaintiff Tangle, Inc. and Defendants Magic Time International, Ltd. Brown Sales &  
3 Marketing LLC hereby enter into this Stipulation Continuing Case Management Conference and  
4 Early Neutral Evaluation Deadlines with reference to the following facts:

5 WHEREAS, on June 22, 2015, the Court issued an Order Setting a Case Management  
6 Conference for September 24, 2015;

7 WHEREAS, on September 8, 2015, the Court issued an Order continuing the date for the  
8 Case Management Conference to October 7, 2015;

9 WHEREAS, on September 17, 2015 the Court issued an Order continuing the date for the  
10 Case Management Conference to November 10, 2015;

11 WHEREAS, on November 5, 2015 the Court issued an Order continuing the date for the  
12 Case Management Conference and the hearing date for Defendants' motion to dismiss (Dkt. No.  
13 30) to December 8, 2015;

14 WHEREAS, on December 1, 2015 the Court issued an Order continuing the date for the  
15 Case Management Conference and the hearing date for Defendants' motion to dismiss (Dkt. No.  
16 30) to January 26, 2016;

17 WHEREAS, on January 4, 2016 the Court issued an Order setting the deadline for the  
18 Early Neutral Evaluation to January 25, 2016;

19 WHEREAS, on January 5, 2016 the Court issued an Order appointing Mark LeHocky as  
20 the ENE Evaluator for this case;

21 WHEREAS, Mr. LeHocky has informed the parties that he has limited availability to  
22 complete the Early Neutral Evaluation before the current deadline;

23 WHEREAS, the Plaintiff's counsel and/or representative are unable to attend the Early  
24 Neutral Evaluation on the dates proposed by Mr. LeHocky (January 15, 18, and 25, 2016) to  
25 complete the Evaluation;

26 WHEREAS, the parties and Mr. LeHocky conducted a teleconference on January 11,  
27 2016 to discuss scheduling and agreed that the parties and Mr. LeHocky are available to conduct

1 the Early Neutral Evaluation on February 22, 2016;

2 WHEREAS, the parties agrees that that it is in the interest of justice to further continue the  
3 Case Management Conference to allow the parties additional time to discuss settlement after the  
4 Early Neutral Evaluation;

5 WHEREAS, lead counsel for the parties are available on Tuesday, March 22, 2016 for a  
6 Case Management Conference and a hearing on Defendants' motion to dismiss (Dkt. No. 30) and  
7 to complete the Early Neutral Evaluation on or before that date;

8 WHEREAS, the parties respectfully request that the Court continue the Case Management  
9 Conference and the hearing on Defendants' motion to dismiss (Dkt. No. 30) to Tuesday, March  
10 22, 2016 and continue the Early Neutral Evaluation deadline to February 23, 2016.

11  
12 Dated: January 12, 2016

LAW OFFICE OF VICTORIA E. BRIEANT

13  
14 By: /s/ Victoria E. Briant  
Victoria E. Briant

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16 Attorney for  
TANGLE INC.

17 Dated: January 12, 2016

LAW OFFICES OF JOHN W. CARPENTER LLC

18  
19 By: /s/ John W. Carpenter  
John W. Carpenter

20  
21 Attorneys for  
TANGLE INC.

22 Dated: January 12, 2016

HUDNELL LAW GROUP

23  
24 By: /s/ Lews E. Hudnell, III  
Lews E. Hudnell, III

25  
26 Attorneys for  
MAGIC TIME INTERNATIONAL, LTD.  
BROWN SALES & MARKETING LLC

27  
28 STIPULATION TO CONTINUE  
CASE MANAGEMENT CONFERENCE  
DATE AND EARLY NEUTRAL  
EVALUATION DEADLINE

CASE NO.: 3:15-CV-2802-WHO

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**ATTORNEY ATTESTATION**

I, Lewis E. Hudnell, III, attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signature (/s/) within this e-filed documents. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 12, 2015

HUDNELL LAW GROUP

By: /s/ Lewis E. Hudnell, III  
Lewis E. Hudnell, III

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~~PROPOSED~~ ORDER

Having read and considered the Parties' Stipulation to Continue Case Management Conference and the Early Neutral Evaluation deadline,

PURSUANT TO STIPULATION, the Court hereby resets the Case Management Conference and the hearing date on Defendants' motion to dismiss (Dkt. No. 30) to March 23, 2016 in Courtroom 2, 17th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102 and the deadline to complete Early Neutral Evaluation to February 23, 2016.

Dated: January 13, 2016



The Honorable William H. Orrick  
JUDGE OF THE U.S. DISTRICT COURT