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

[24]7.ai, INC. AND 24/7 CUSTOMER
 INTERNATIONAL HOLDINGS, LTD.,

Plaintiffs,

v.

LIVEPERSON, INC.,

Defendant.

LIVEPERSON, INC.,

Plaintiff,

v.

[24]7.ai, INC.

Defendant.

Case No. 3:15-CV-02897-JST (KAW) (lead)
 Case No. 3:15-CV-05585-JST (KAW)

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEPOSITION
 DEADLINE RE: MESSRS.
 VIJAYARAGHAVAN AND GARIKIPATI**

Case No. 3:17-CV-01268-JST

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEPOSITION
 DEADLINE RE: MESSRS.
 VIJAYARAGHAVAN AND GARIKIPATI**

STIPULATION TO EXTEND DEPOSITION
 DEADLINE RE: MESSRS. VIJAYARAGHAVAN
 AND GARIKIPATI

CASE NOS. 3:17-CV-01268-JST;
 3:15-CV-02897-JST (KAW); 3:15-CV-05585-JST (KAW)

1 **STIPULATION AND [PROPOSED] ORDER**

2 Pursuant to Local Rules 6-1 and 6-2, Defendants [24]7.ai, Inc. and 24/7 Customer
3 International Holdings (“collectively, “[24]7”) and Plaintiff LivePerson, Inc. (“LivePerson”)
4 (together, the “Parties”) hereby respectfully move the Court to issue an order allowing two
5 depositions to be taken after the deadline for the close of fact discovery for deposition, March 16,
6 2018, in Case Nos. 3:17-cv-01268 (“the Trade Secret Matter”), and 3:15-cv-02897 and 3:15-cv-
7 05585 (“the Patent Action”, and collectively with the Trade Secret Action, “the Actions”).

8 WHEREAS, on September 11, 2017 the Parties sought deposition testimony of Ravi
9 Vijayaraghavan and Ravi Garikipati (“the witnesses”), through the Hague Convention on Taking
10 Evidence Abroad, thereby moving for this Court to issue a corresponding Letter of Request
11 (Patent Action ECF 160);

12 WHEREAS, on September 27, 2017 this Court issued a Letter of Request to the High
13 Court of Karnataka in Bangalore, India (the “Indian Court”) requesting authorization for the
14 parties to obtain deposition testimony from the witnesses (Patent Action ECF 162);

15 WHEREAS, on February 26, 2018, the parties received notification from Sarathi
16 Susheela, the Mediator and Coordinator appointed by the Indian Court to oversee the depositions,
17 of authorization to proceed with live depositions (Exhibit B);

18 WHEREAS, the parties are currently arranging times for the live depositions with the
19 witnesses, counsel, and Mr. Susheela, but it is apparent that they depositions will not be
20 completed by the current March 16, 2018 deadline for the close of fact discovery for deposition.

21 WHEREFORE, the Parties agree to the following:

22 The depositions of Ravi Vijayaraghavan and Ravi Garikipati may take place beyond the
23 current fact discovery deposition cut-off of March 16, 2018, at dates to be approved by Sarathi
24 Susheela, the Indian Court appointed Mediator and Coordinator, and agreed to by the Parties.
25 Depositions of these witnesses may not be conducted after April 30, 2018 absent agreement of the
26 Parties or an order of the Court on a showing of good cause.

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ATTESTATION

Pursuant to Local Rule 5-1(i)(3) I hereby attest that concurrence in the filing of this document has been obtained from Michael W. De Vries.

By: /s/ Darin S. Snyder
Darin W. Snyder

Attorneys for Defendant
[24]7.ai, Inc.

~~**PROPOSED**~~ **ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 13, 2018



Hon. Jon S. Tigar
United States District Judge