

1 [ADDITIONAL COUNSEL LISTED ON
2 SIGNATURE PAGE]

3 Steven T. Lowe, Esq. SBN 122208
4 steven@lowelaw.com
5 Kris LeFan, Esq., SBN 278611
6 kris@lowelaw.com
7 LOWE & ASSOCIATES, P.C.
8 1140 Olympic Blvd., Suite 640
9 Los Angeles, CA 90064
10 Telephone: (310) 477-5811
11 Facsimile: (310) 477-7672

12 Hao Ni (pro hac vice pending)
13 hni@nilawfirm.com
14 NI, WANG & MASSAND, PLLC
15 8140 Walnut Hill Lane, Suite 500
16 Dallas, TX 75231
17 Telephone: (972) 331-4600
18 Facsimile: (972) 314-0900

19 Attorneys for Plaintiff
20 HALL DATA SYNC TECHNOLOGIES, LLC

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA

23 HALL DATA SYNC TECHNOLOGY,
24 LLC,
25 Plaintiff,

26 v.

27 BOX, INC.,
28 Defendant.

29 HALL DATA SYNC TECHNOLOGIES
30 LLC,
31 Plaintiff,

32 vs.

33 DROPBOX INC.
34 Defendant.

Case Nos. 15-CV-3063-VC, 15-CV-3064-VC,
15-CV-3065-VC

STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR RELIEF FROM DEADLINE TO
FILE JOINT CASE MANAGEMENT
CONFERENCE STATEMENT IN RELATED
ACTIONS PURSUANT TO L.R. 16-2(D)

JURY TRIAL DEMANDED

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

HALL DATA SYNC TECHNOLOGIES
LLC,

Plaintiff,

vs.

GOOGLE INC.

Defendant.

1 The Parties in the above captioned cases jointly move under Civ. L.R. 16-2(d) for a
2 three-day extension to the deadline to submit the Joint Case Management Conference
3 Statement (“Joint CMC Statement”) to allow additional time review and submit an agreed upon
4 Statement.

5 Local Rule 16-2(d) provides that “a party...may seek relief from an obligation imposed
6 by Fed. R. Civ. P. 16 or 26 or the Order Setting Initial Case Management Conference.” In this
7 case, the Court should exercise its discretion to permit a three-day modification to the deadline
8 to submit the Joint CMC Statement. The Parties in these related actions have made their best
9 effort to comply with the Court’s August 12th Order (Dkt. 29 in Case No. 15-3063; Dkt. 25 in
10 Case No. 15-3064; Dkt. 21 in Case No. 15-3065) setting August 18th as the deadline to submit
11 the Parties’ Joint CMC Statement. Since receiving notice of the deadline, the Parties have
12 discussed the contents of the Joint CMC Statement telephonically and have also exchanged an
13 initial draft of the Statement. Additional time is needed, however, to allow the parties as well
14 as their in-house representatives to review the Joint CMC Statement and proposed schedule,
15 and to allow further time for the parties to attempt to reach agreement on its contents. The
16 extension will also save the Court time and resources reviewing issues that may otherwise be
17 worked out between the Parties. Moreover, lead counsel for Google has a hearing scheduled
18 before the Honorable Judge Virginia Phillips in the Central District of California on August
19 18th, which has made coordination on the Joint CMC Statement difficult.

20 In sum, the Parties in these related actions believe that there is good cause for a short
21 three-day extension and respectfully request that the Court extend the deadline to submit the
22 Joint CMC Statement from August 18, 2015 to August 21, 2015. No other deadline will be
23 affected by this extension (including the Case Management Conference itself).

24 IT IS HEREBY STIPULATED AND AGREED, by and among the parties and their
25 respective counsel of record and with the permission of the Court, that deadline to submit the
26 Parties Initial Case Management Statement in this action shall be continued to Friday,
27 August 21, 2015.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: August 18, 2015

RESPECTFULLY SUBMITTED,
LOWE & ASSOCIATES, P.C.

BY: /s/Kris LeFan
KRIS LEFAN

ATTORNEYS FOR PLAINTIFF
HALL DATA SYNC TECHNOLOGIES, LLC

Dated: August 18, 2015

KASOWITZ, BENSON, TORRES & FRIEDMAN
LLP

BY: /s/ John Downing
JEFFREY J. TONEY
JONATHAN K. WALDROP
DARCY L. JONES
MARCUS A. BARBER
ROBERT P. WATKINS III
JOHN W. DOWNING
HEATHER S. KIM

ATTORNEYS FOR DEFENDANT
GOOGLE INC.

Dated: August 18, 2015

DLA PIPER LLP (US)

BY: /s/ AARON WAINSCOAT
JOHN GUARAGNA
AARON WAINSCOAT

ATTORNEYS FOR DEFENDANT
BOX INC.

Dated: August 18, 2015

FARELLA BRAUN + MARTEL LLP

BY: /s/ JEFFREY FISHER
Jeffrey M. Fisher
Deepak Gupta
Winston Liaw

ATTORNEYS FOR DEFENDANT
DROPBOX INC.

I hereby attest pursuant to L.R. 5.1(i)(3) that concurrence in the electronic filing of this document has been obtained from the other signatories.

Dated: August 18, 2015

/s/ KRIS LEFAN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

The Court having considered the stipulation of the parties, orders as follows:

- The parties shall file a Joint Case Management Statement on or before Friday, August 21, 2015.

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: August 20, 2015



Honorable Vince Chhabria
United States District Judge