



1 [List of Counsel/Parties Continued]

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13 Defendant *in pro per*

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1 Pursuant to the United States District Court, Northern District of California Local  
2 Rules, Rules 6-1(b) and 6-2, Louise Ann Fernandez, attorney for plaintiff Artec Group,  
3 Inc. ("Artec" or "Plaintiff"), and defendants Andrey Klimov and Anna Stebleva  
4 ("Defendants"), *in pro per*, state and stipulate as follows:

5 1. Pursuant to the Court's February 3, 2017 Case Management and Pretrial  
6 Order for Jury Trial (the "CMO") (Dkt. 171), the deadline for the exchange of opening  
7 expert reports is currently scheduled for August 17, 2017, the deadline for the exchange of  
8 rebuttal expert reports is currently scheduled for September 17, 2017, the expert discovery  
9 cutoff is currently scheduled for September 28, 2017, and the last day for the hearing of  
10 dispositive motions is currently scheduled for November 9, 2017.

11 2. One of the main issues in this case is Artec's allegation that Defendants  
12 misappropriated Artec's proprietary source code. Artec therefore requested in discovery,  
13 first through written requests served in October 2016 and then through specific meet and  
14 confer efforts beginning in January 2017, that Defendants produce all relevant source code  
15 in their possession, custody or control.

16 3. Defendants contended that they were required to obtain third party  
17 permission before producing some of the source code in their possession, custody or  
18 control, and did not produce a substantial portion of their source code production to date,  
19 comprising approximately 85,000 lines of code, until July 12, 2017.

20 4. Source code analysis is a complex and time consuming endeavor, and the  
21 parties agree that the current expert opening report deadline of August 17, 2017 does not  
22 provide Artec with sufficient time for its experts to fully and completely analyze  
23 Defendants' source code. Additionally, due to the simultaneous motions for withdrawal of  
24 counsel for all defendants on February 22, 2017, and the resultant stay of proceedings  
25 through April 28, 2017 (Dkt. 225) and subsequently through May 12, 2017 (Dkts. 235-  
26 236), Artec has not been able to conduct all discovery with sufficient time to provide all  
27 relevant discovery documents to its experts under the deadlines set forth in the CMO.  
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Dated: July 25, 2017                      Respectfully submitted,

By: /s/ Andrey Klimov  
ANDREY KLIMOV  
Defendant, *in pro per*

Dated: July 25, 2017                      Respectfully submitted,

By: /s/ Anna Stebleva  
ANNA STEBLEVA  
Defendant, *in pro per*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED. (as revised on P. 4)

Dated: July 27, 2017

