

1 SARAH S. ESKANDARI (SBN 271541)
 DENTONS US LLP
 2 One Market Plaza
 Spear Tower, 24th Floor
 3 San Francisco, California 94105
 Telephone: (415) 267-4000
 4 Facsimile: (415) 267-4198
 Email: sarah.eskandari@dentons.com

5 Attorneys for Plaintiff
 6 SYNCHRONOSS TECHNOLOGIES, INC.

7
 8 STEPHEN E. TAYLOR (SBN 58452)
 JONATHAN A. PATCHEN (SBN 237346)
 TAYLOR & PATCHEN, LLP
 9 One Ferry Building, Suite 355
 San Francisco, California 94111
 10 Telephone: (415) 788-8200
 Facsimile: (415) 788-8208
 11 E-mail: staylor@taylorpatchen.com
 E-mail: jpatchen@taylorpatchen.com

12 Attorneys for Defendant
 13 DROPBOX, INC.

14
 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**
 18

19 SYNCHRONOSS TECHNOLOGIES, INC.,

20 Plaintiff,

21 v.

22 DROPBOX, INC.,

23 Defendant.
 24

Case No.: 3:16-CV-00119-HSG

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND ORDER**

[CIVIL LOCAL RULE 6-2]

Honorable Haywood S. Gilliam, Jr.

Complaint Filed: March 27, 2015
 Case Transferred: January 8, 2016

1 Defendant Dropbox, Inc. (“Dropbox”) and Plaintiff Synchronoss Technologies, Inc.
2 (“Synchronoss”), (collectively the “Parties”), by and through their respective counsel and
3 subject to the Court’s approval, have met and conferred and stipulate as follows:

4 WHEREAS, on January 4, 2017, the Court issued an Order Setting Schedule that set a
5 January 23, 2017 deadline for the Parties to submit an ESI Stipulation and Protective Order
6 (ECF 116);

7 WHEREAS, in light of the fact that, to date, the Parties continue to negotiate the
8 substance of the ESI Stipulation and Protective Order, and given the complexity of the case,
9 have not yet come to an agreement on the terms of such a stipulation and Protective Order;

10 WHEREAS, the Parties are scheduled to meet and confer on January 31, 2017, to
11 finalize disputed terms and, given these facts, the Parties believe there is good cause to further
12 extend the date for the Parties to submit their ESI Stipulation and Protective Order by four
13 days, from January 30, 2017, to and including February 3, 2017;

14 WHEREAS, there have only been three prior time modifications in this case: (1) when
15 the Court granted Synchronoss’ motion for an extension of time to respond to Dropbox’s
16 original February 5, 2016 motion to dismiss (ECF 70, 71); (2) when the Court granted the
17 Parties’ Stipulated Request for an extension of time for Dropbox to file its reply in support of
18 the Motion to Dismiss (ECF 90, 91); and (3) recently when the Court granted the Parties’
19 stipulated request for an extension of time to submit their ESI Stipulation and Protective
20 Order (ECF 121); and

21 WHEREAS, the Parties’ requested extension will have no impact on the schedule for
22 the case overall, as the remaining deadlines in the Scheduling Order will be unaffected; the
23 requested four day extension will leave the Parties with ten (10) days prior to the February 15,
24 2017 due date for Synchronoss’ Disclosure of Asserted Claims and Infringement Contentions
25 and accompanying document production, per Patent Local Rules 3-1 and 3-2 and the Order
26 Setting Schedule (ECF 116); and the brief extension will not prejudice any Party.

27 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND
28 BETWEEN THE PARTIES THROUGH THEIR RESPECTIVE COUNSEL, THAT subject to the

1 Court's approval: The date for the Parties to file their ESI Stipulation and Protective Order is
2 extended from January 30, 2017, to and including February 3, 2017.

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: January 30, 2017

DENTONS US LLP

By: /s/ Sarah S. Eskandari
SARAH S. ESKANDARI (SBN 271541)
One Market Plaza,
Spear Tower, 24th Floor
San Francisco, CA 94105
Telephone: (415) 267-4000
Facsimile: (415) 267-4198
Email: sarah.eskandari@dentons.com

*Attorneys for Plaintiff
Synchronoss Technologies, Inc.*

Dated: January 30, 2017

TAYLOR & PATCHEN, LLP

By: /s/ Jonathan A. Patchen
STEPHEN E. TAYLOR (SBN 058452)
JONATHAN A. PATCHEN (SBN 237346)
One Ferry Building, Suite 355
San Francisco, CA 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
E-mail: staylor@taylorpatchen.com
E-mail: jpatchen@taylorpatchen.com


*Attorneys for Defendant
Dropbox, Inc.*

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

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 30, 2017


HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT COURT JUDGE

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

FILER'S ATTESTATION:

I, Sarah S. Eskandari, am the ECF user whose ID and password are being used to file the above **STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] ORDER [CIVIL LOCAL RULE 6-2]**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each listed counsel above has concurred in this filing.

Dated: January 30, 2017

By /s/ Sarah S. Eskandari
SARAH S. ESKANDARI