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11 *Attorneys for Defendants and Counterclaim/Third*
 12 *Party Plaintiffs*

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 YLD LIMITED,)
17 Plaintiff,)
18)
19 v.)
20 THE NODE FIRM, LLC, NODE SOURCE, LLC,)
21 NODESOURCE INC., DANIEL SHAW, and JOE)
22 MCCANN,)
23 Defendants.)
24 YLD LIMITED,)
25 Counterclaim Defendant,)
26 and)
27 NUNO JOB,)
28 Third-Party Counterclaim Defendant)

Case No. 16-cv-00399-VC

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING YLD
 LIMITED AND NUNO JOB'S
 TIME TO RESPOND TO
 COUNTERCLAIMS AND THIRD
 PARTY CLAIMS**

1 This stipulation is entered into by and among the parties to the above-entitled action YLD
2 LIMITED (“Plaintiff”), NUNO JOB (“Third Party Counterclaim Defendant”), THE NODE FIRM,
3 LLC, NODE SOURCE, LLC, NODESOURCE INC., DANIEL SHAW, and JOE MCCANN
4 (“Defendants”, and with Plaintiff, and Third Party Counterclaim Defendant the “Parties”) by and
5 through their respective counsel:

6 **WHEREAS**, on August 17, 2016 the Court issued an Order granting in part and denying in
7 part the Third Party Counterclaim Defendant’s motion to dismiss [ECF 87]. Among other things,
8 the Court’s August 17, 2016 Order, granted Defendant’s request for leave to amend its defamation
9 claim and provided Defendants with fourteen days to file any amended third party complaint;

10 **WHEREAS**, Defendants filed their Amended Answer to Plaintiff’s Second Amended
11 Complaint, Affirmative Defenses, Counterclaims and Third-Party Claims on August 31, 2016 [ECF
12 89] (the “Amended Counterclaims and Third Party Claims”);

13 **WHEREAS**, Plaintiff and Third Party Counterclaim Defendant have requested that their
14 time to respond to the Amended Counterclaims and Third Party Claims be extended by fourteen
15 (14) days i.e. up to and including September 28, 2016;

16 **WHEREAS**, the parties have agreed to extend Plaintiff and Third Party Counterclaim
17 Defendant’s time to respond to the Amended Counterclaims and Third Party Claims by fourteen
18 (14) days i.e. up to and including September 28, 2016, *inter alia*, to discuss certain issues that Third
19 Party Counterclaim Defendant has raised, in order to hopefully avoid further motion practice;

20 **WHEREAS**, the parties do not believe that the instant request will have an effect on the
21 schedule for this case;

22 **NOW THEREFORE**, for good cause as show above, pursuant to Civil Local Rules 6-1(b)
23 and 6-2(a) the Parties hereby stipulate and agree, through their respective counsel as follows:

24 1. Plaintiff and Third Party Counterclaim Defendant’s time to respond to the Amended
25 Counterclaims and Third Party Claims is extended by fourteen (14) days i.e. up to and including
26 September 28, 2016.

27 **IT IS SO STIPULATED**, through Counsel of Record.

1 Dated: September 14, 2016

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By: /s/ Gary Adelman
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 15, 2016



HON. VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE