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17 Attorneys *Specially Appearing* for Defendants  
 18 AXUS STATIONARY (HONG KONG) LTD.,  
 19 ANDRE VIEGAS, HIGHTON LTD., ROBERTA  
 20 TRADING CORPORATION and KENPARK LTD

21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA

23 PRODUCTS AND VENTURES  
 24 INTERNATIONAL,

25 Plaintiff,

26 v.

27 AXUS STATIONARY (SHANGHAI)  
 28 LTD., AXUS STATIONARY (HONG  
 KONG) LTD., SHANGHAI MARCO  
 STATIONARY CO. LTD., SHANGHAI  
 LAIKESHENG PEN MATERIAL CO.  
 LTD. d/b/a/ SHANGHAI LEXON,  
 PEIFENG XU, ANDRE VIEGAS,  
 HIGHTON LTD., ROBERTA TRADING  
 CORPORATION, and KENPARK LTD.

Defendants.

Case No.: 3:16-CV-669

**STIPULATION FOR EXTENSION OF  
 TIME TO RESPOND TO COMPLAINT**

**[SPECIAL APPEARANCE]**

1 Defendants Axus Stationary (Hong Kong) Ltd., Andre Viegas, Highton Ltd., Roberta  
2 Trading Corporation and Kenpark Ltd. (collectively, “the Defendants”) hereby specially appear in  
3 the above-captioned case for the limited purpose of filing this Stipulation for Extension of Time  
4 to Respond to Complaint. The Defendants’ special and limited appearance is not intended, and  
5 shall not be construed, as a waiver of any of the Defendants’ rights to challenge the jurisdiction of  
6 this Court or the sufficiency of service in this matter.

7 The Defendants and plaintiff Products and Ventures International have met and conferred  
8 and state the following:

9 Whereas, the Defendants have requested an extension of time for the Defendants to  
10 respond to the complaint in the above-captioned action and the plaintiff is willing to  
11 accommodate that request;

12 Therefore, pursuant to Civil Local Rule 6-1(a), the plaintiff and the Defendants, by and  
13 through their respective counsel, hereby stipulate and agree that the Defendants shall have an  
14 extension of time up to and including April 18, 2016 in which to respond to the complaint in this  
15 action.

16 **IT IS SO STIPULATED.**

17 Dated: March 21, 2016

GAW POE LLP

19 By: /s/ Randolph Gaw

20 Randolph Gaw  
21 Attorneys for Plaintiff  
22 PRODUCTS AND VENTURES  
23 INTERNATIONAL

24 Dated: March 21, 2016

HOGAN LOVELLS US LLP

25 Dated: 3/22/16

26 By: /s/ Mark C. Goodman

27 Mark C. Goodman  
28 Attorneys *Specially Appearing* for Defendants  
AXUS STATIONARY (HONG KONG)  
LTD., ANDRE VIEGAS, HIGHTON LTD.,  
ROBERTA TRADING CORPORATION and  
KENPARK LTD

