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 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

12 DYNATRACE LLC,
 13
 Plaintiff,
 14
 v.
 15
 JAMES RAMEY, an individual, and
 16 DEVICEBITS LLC, an Ohio limited
 liability company,
 17
 Defendants.

Case No. 3:16-cv-01777-EMC
STIPULATION AND [~~PROPOSED~~]
ORDER CONTINUING INITIAL
CASE MANAGEMENT
CONFERENCE

1 Pursuant to Civil L.R. 6-1 (b), Plaintiff Dynatrace LLC. (“Dynatrace”) and Defendants
2 James Ramey and DeviceBits LLC (collectively, “Defendants”), by and through their undersigned
3 attorneys, hereby state and stipulate, subject to Court approval, as follows:

4 WHEREAS, on April 27, 2016, this Court issued an Order scheduling an initial Case
5 Management Conference in this matter for July 21, 2016, at 9:30 a.m. and providing that the parties
6 are to file a joint Case Management Conference Statement one week prior to the conference (*see*
7 D.I. 13);

8 WHEREAS, lead counsel for Dynatrace has pre-paid vacation travel to New York City
9 planned for July 21, 2016;

10 WHEREAS, counsel for Dynatrace and Defendants have met and conferred and are
11 amenable to continuing the Case Management Conference by one week, to July 28, 2016 (or, if the
12 Court is not available on that date, to the next available date on the Court’s calendar), with the joint
13 Case Management Conference Statement to be filed one week prior, on July 21, 2016;

14 WHEREAS, there have been no previous time modifications, except that the Parties have
15 stipulated to a 15 day extension of time for Defendants to answer or otherwise respond to the
16 Complaint, to May 24, 2016, as set forth in a contemporaneous filing;

17 WHEREAS, this requested continuance will have minimal to no impact on the case
18 management schedule, as no schedule has been adopted and no trial date has been set;

19 NOW THEREFORE, IT IS STIPULATED AND AGREED, subject to this Court’s
20 approval, that the initial Case Management Conference in this matter shall be continued by one
21 week, to July 28, 2016, at 9:30 a.m., in Courtroom 5, (or, if the Court is not available on that date,
22 to the next available date on the Court’s calendar), and the joint Case Management Conference
23 Statement shall be filed one week prior, on July 21, 2016.

DUANE MORRIS LLP

1
2 Dated: May 6, 2016

By: /s/ Karineh Khachatourian
Karineh Khachatourian
Daniel T. McCloskey
Anjali Moorthy
Attorneys for Plaintiff,
DYNATRACE LLC

GORDON REES, LLP

6
7 Dated: May 6, 2016

By: /s/
Michael Pietrykowski

Attorneys for Defendants,
JAMES RAMEY and DEVICEBITS LLC

10 **ATTESTATION**

11 Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I attest under penalty of perjury that
12 the concurrence in the filing of this document has been obtained from its signatories.

13 DUANE MORRIS LLP

14 Dated: May 6, 2016

By: /s/ Karineh Khachatourian
Karineh Khachatourian
Daniel T. McCloskey
Anjali Moorthy

Attorneys for Plaintiff,
DYNATRACE LLC

19 **ORDER**

20 Having read and considered the foregoing Stipulation of the parties submitted herewith and
21 for good cause shown,

22 PURSUANT TO STIPULATION, IT IS SO ORDERED:

23 Dated: May 9, 2016

24 Hon. Edward M. Chen
25 UNITED STATES

