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

18 VARIOUS, INC., a California corporation,
 19 Plaintiff,
 20 v.
 21 JEDI TECHNOLOGIES, INC., an Arizona
 corporation,
 22 Defendant.

CASE NO. 3:16-CV-1833-WHA

**STIPULATION FOR ORDER
 CONTINUING CASE
 MANAGEMENT CONFERENCE ,
 HEARING DATE ON MOTION TO
 DISMISS AND RELATED
 DEADLINES; ~~PROPOSED~~ ORDER**

Current CMC: June 23, 2016
Current MTD Hearing: June 23, 2016
**Proposed CMC and
 MTD Hearing date: July 21, 2016**

STIPULATION

Pursuant to Local Rules, 6-2, 7-12, and 16-2(e), Plaintiff Various, Inc. (“Plaintiff”), and Defendant Jedi Technologies, Inc. (“Defendant”), through their respective counsel of record (collectively, the “Parties”), hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on April 8, 2016 (“Complaint”);

WHEREAS, on April 11, 2016 the Court set an Initial Case Management Conference on July 7, 2016 (Dkt. 8);

WHEREAS, Defendant filed its Motion to Dismiss for Lack of Personal Jurisdiction on May 3, 2016 (“Motion to Dismiss”) which it elected to continue with as if directed at the amended complaint filed by Plaintiff on May 13, 2016;

WHEREAS, on May 19, 2016, the Court set Defendant’s Motion to Dismiss for hearing on June 23, 2016 (Dkt. 28);

WHEREAS, on May 31, 2016, the Court reset the Initial Case Management Conference to June 23, 2016 (Dkt. 29), and the Initial Case Management Conference in this case is currently set for June 23, 2016, at 8:00 a.m. in Courtroom 8 of the above-captioned court;

WHEREAS, the Parties conducted the Rule 26(f) conference on June 2, 2016;

WHEREAS, the Case Management Statement is due by June 16, 2016;

WHEREAS, counsel for Plaintiff have previously scheduled business travel plans that conflict with the June 23, 2016, Initial Case Management Conference and Motion to Dismiss hearing date;

WHEREAS, counsel for Plaintiff and Defendant have met and conferred on alternative dates for the Initial Case Management Conference and Motion to Dismiss hearing and are available on July 21, 2016, or thereafter at the Court’s convenience;

WHEREAS, good cause exists to reschedule the upcoming Initial Case Management Conference and hearing on the Motion to Dismiss because Plaintiff is unable to appear in person for the Initial Case Management Conference and the Motion to Dismiss hearing without canceling other plans that cannot be rescheduled, and because it will likely be more productive for the Court and the Parties if Plaintiff’s counsel does appear in person;

1 WHEREAS, Plaintiff has also served discovery on Defendants, responses to which are
2 due on July 7 (30 days plus 3 days after the Rule 26(f) conference on June 2); and

3 WHEREAS, Defendant requested, and Plaintiff, agreed, to move the discovery response
4 date to fourteen (14) days after the rescheduled Initial Case Management Conference.

5 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties,
6 through their respective counsel and subject to the Court's approval, that the date for the Initial
7 Case Management Conference and the hearing on Motion to Dismiss be rescheduled to
8 Thursday, July 21, 2016, or as soon thereafter as is convenient for the Court. The Parties shall
9 file a Joint Case Management Statement not less than seven days prior to the new date set for the
10 conference. Defendant's responses to Plaintiff's discovery requests currently due on July 7,
11 2016, will now be due fourteen (14) days after the new date for the Initial Case Management
12 Conference.

13 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

14 Dated: June 7, 2016

VENABLE LLP,

15 By: /s/ Kimberly Culp
16 Kimberly Culp
17 William A. Hector
Attorneys for VARIOUS, INC.


18 Dated: June 7, 2016

DAVIS WRIGHT TREMAINE LLP,

19 By: /s/ Martin L. Fineman
20 Martin L. Fineman
21 Attorneys for JEDI TECHNOLOGIES, INC.

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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24 Dated: June 7, 2016.


25 Honorable William Alsup
26 United States District Judge
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