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9 *Attorneys for Plaintiff*
10 *Synchronoss Technologies, Inc.*

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14
15 SYNCHRONOSS TECHNOLOGIES, INC.,

16 Plaintiff,

17 v.

18 FUNAMBOL, INC.

19 Defendant.

Case No. 5:16-cv-02026-HSG

**STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Date: June 21, 2016
Time: 2:00 pm
Dept: Courtroom 10, 19th Floor
Judge: Hon. Haywood S. Gilliam, Jr.

21 Pursuant to Civil Local Rule 6-2, Plaintiff, Synchronoss Technologies, Inc.
22 (“Synchronoss” or “Plaintiff”), and Defendant Funambol, Inc. (“Funambol” or “Defendant”)
23 (collectively, the “Parties”), respectfully request that the Court enter the following stipulation to
24 continue the date of the Case Management Conference.
25

26 **I. Factual Background**

27 In support of this stipulation, the undersigned Parties provide the following facts:
28

1 A. On April 20, 2016, this matter was transferred to this District from the United
2 States District Court of New Jersey and reassigned to United States District Court Magistrate
3 Judge Nathanael M. Cousins. (ECF 41.)

4 B. On May 16, 2016, Defendant filed, pursuant to Civil Local Rule 3-12, an
5 administrative motion to consider whether this case should be related to two cases currently
6 pending before Judge Gilliam: (1) *Synchronoss Techs., Inc. v. Dropbox, Inc.*, Case No. 16-CV-
7 00119-HSG; and (2) *Synchronoss Techs., Inc. v. Egnyte, Inc.*, Case No. 16-CV-00120-HRL. *See*
8 *Synchronoss Techs., Inc. v. Dropbox, Inc.*, 3:16-cv-00119-HSG (ECF 104.) On May 25, 2016,
9 this Court granted Defendant's administrative motion and issued an order relating this matter to
10 the *Egnyte* and *Dropbox* matters. (ECF 106.)

11 C. On June 2, 2016, the Court issued an Order Setting Case Management Conference
12 and ADR Deadlines, setting the Case Management Conference for June 21, 2016 at 2 p.m., and
13 setting related deadlines based on that date. (ECF 55.)

14 D. Lead counsel for Plaintiff is not available on June 21, 2016 at 2 p.m. to attend the
15 Case Management Conference as they are already scheduled to appear at a Case Management
16 Conference in the Superior Court of Santa Clara County for another matter.

17 E. Currently pending before this Court is Dropbox's Motion to Dismiss Synchronoss'
18 complaint, filed on March 10, 2016 (ECF 81.) As a result, the Case Management Conferences in
19 the *Dropbox* and *Egnyte* matters have been continued until further notice from the Court pending
20 the Court's decision on Dropbox's motion. (ECF 100.)

21 F. Based on these facts, the Parties believe a continuance is necessary in order to give
22 the parties adequate time to meet and confer on the relevant issues. Further, the Parties believe a
23 continuance would be in the interest of judicial economy, conserve the Court's and the Parties'
24 resources, and allow for a more efficient and productive discussion with the Court.

25 G. The Parties met and conferred and agreed to request a continuance of the Case
26 Management Conference to July 19, 2016 or a later date, subject to the convenience of the court.

27 H. The Parties agree that this stipulation does not modify any other deadlines in the
28

1 case schedule.

2 I. The Parties previously requested a two-week extension with respect to the Case
3 Management Conference, pending the Court's decision on the administrative motion to relate the
4 case to *Dropbox* and *Egnyte*. (ECF 52.) See Civil L.R. 6-2(a)(2).

5 **II. Stipulation**

6 In light of the above facts, the Parties jointly request that the Court enter the following
7 stipulation as an Order of the Court:

8 A. The Case Management Conference shall be continued to July 19, 2016 at 2:00
9 p.m. or a later date subject to the convenience of the Court.

10 **IT IS SO STIPULATED.**

11 Dated: June 7, 2016

Respectfully submitted,

DENTONS US LLP

By: /s/ Sarah S. Eskandari
Sarah S. Eskandari

COUNSEL FOR PLAINTIFF
SYNCHRONOSS TECHNOLOGIES, INC.

12 Dated: June 7, 2016

DURIE TANGRI US LLP

By: /s/ Timothy C. Saulsbury
Timothy C. Saulsbury

COUNSEL FOR DEFENDANT
FUNAMBOL, INC.

13 Pursuant to Civil L. R. 5-1(i)(3), I attest that concurrence in the filing of this document has
14 been obtained from each of the other signatories above.

15 Dated: June 7, 2016

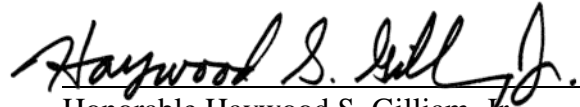
By: /s/ Sarah S. Eskandari
Sarah S. Eskandari

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 7, 2016



Honorable Haywood S. Gilliam, Jr.
United States District Judge

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below I caused to be served the Stipulation and [Proposed] Order to Continue Case Management Conference via the Court’s CM/ECF system upon all counsel of record registered to received electronic filings as indicated on the Court’s website, pursuant to Fed. R. Civ. P. 5(b)(2)(E) and Local Rule 5-1.

Dated: June 7, 2016

By: /s/ Sarah S. Eskandari