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9 Attorneys for Defendant
 STEPHEN GOULD CORPORATION

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

13 HYDROS BOTTLE LLC, a Delaware Limited
 Liability Company,
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 Plaintiff,
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 16 vs.
 17 STEPHEN GOULD CORPORATION, a New
 Jersey Corporation,
 18
 Defendant.
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Case No.: 3:16-cv-04077-JST

**JOINT REQUEST AND STIPULATION
 FOR FURTHER EXTENSION OF TIME;
 [PROPOSED] ORDER**

20 **STIPULATION**

21 Pursuant to Civil Local Rule 6-2, Plaintiff Hydros Bottle LLC (“Plaintiff”) and Defendant
 22 Stephen Gould Corporation (“Defendant”) hereby stipulate and agree as follows, subject to approval
 23 by the Court:

24 WHEREAS, Plaintiff filed its Complaint in this action on July 20, 2016 (D.I. 1);

25 WHEREAS, following a prior stipulation and an Order of the Court (D.I. 15), Defendant
 26 currently has up to and including October 21, 2016 to answer, move, and/or otherwise respond to
 27 Plaintiff’s Complaint;

28 WHEREAS, the parties have been engaging in discussions that would resolve and/or narrow

1 certain portions of Plaintiff's claims, and the Parties are close to finalizing those discussions;

2 WHEREAS, further, in the course of preparing to respond to Plaintiff's Complaint,
3 Defendant has raised a legal issue with one of Plaintiff's causes of action, an issue that Plaintiff is
4 presently evaluating;

5 WHEREAS, the parties anticipate filing a further stipulation shortly to address the foregoing
6 matters and that such a further stipulation would provide time for Plaintiff to amend its Complaint;

7 WHEREAS, the parties anticipate that an extension of approximately 10 days would allow
8 them sufficient time to address the foregoing matters;

9 WHEREAS, the parties agree that by entering into this stipulation and/or requesting the
10 accompanying order, Defendant is not waiving any rights to move on the Complaint and/or
11 obligating itself to answer and/or otherwise respond to the Complaint in any particular way; and

12 WHEREAS, there have been one previous time modification in this case, but this further
13 modification is not made for purposes of delay, but rather as part of a continued good faith effort by
14 the parties to avoid or limit expenditure of Court resources where feasible.

15 THEREFORE, IT IS HEREBY STIPULATED by and between the parties, and through their
16 respective attorneys of record and subject to order of the Court, that Defendant shall have up to and
17 including November 1, 2016 to answer, move, and/or otherwise respond to Plaintiff's Complaint; or
18 the Parties shall enter a further stipulation by that date.

19 Dated: October 20, 2016

KELLER, SLOAN, ROMAN & HOLLAND LLP

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21 By: /s/ Christopher T. Holland

22 CHRISTOPHER T. HOLLAND
23 Attorneys for Defendant
STEPHEN GOULD CORPORATION

24 Dated: October 20, 2016

McKool Smith Hennigan, P.C.

25
26 By: /s/ Thomas B. Watson

27 THOMAS B. WATSON
28 Attorneys for Plaintiff
HYDROS BOTTLE LLC

CIVIL L.R. 5-1(i) ATTESTATION

I, Christopher T. Holland, hereby attest that I have been authorized by Thomas B. Watson, counsel for Plaintiff Hydros Bottle LLC, to execute on his behalf this Stipulated Request for an Order Extending Time to Answer, Move, and/or Otherwise Respond to Complaint and Continuing Related Case Deadlines.

Dated: October 20, 2016

/s/ Christopher T. Holland
Christopher T. Holland

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PROPOSED ORDER

Under consideration of the parties' Stipulated Request for an Order Extending Time to Answer, Move, and/or Otherwise Respond to Complaint, and good cause appearing,

IT IS HEREBY ORDERED THAT:

- (1) Defendant shall have up to and including November 1, 2016 to answer, move, and/or otherwise respond to Plaintiff's Complaint.

IT IS SO ORDERED.

Dated: October 21, 2016



HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE