

1 THOMAS B. WATSON (SBN 181546)
 2 MCKOOL SMITH HENNIGAN, PC
 3 300 S. Grand Avenue, Suite 2900
 4 Los Angeles, CA 90071
 5 Telephone: (213) 694-1200
 6 Facsimile: (213) 694-1234
 7 twatson@mckoolsmith.com
 8
 9 Attorneys for Plaintiff and Counter-Defendant
 10 HYDROS BOTTLE LLC

11 CHRISTOPHER T. HOLLAND (SBN 164053)
 12 HOLLAND LAW
 13 220 Montgomery Street, Suite 800
 14 San Francisco, CA 94104
 15 Telephone: (415) 200-4981
 16 cholland@hollandlawllp.com

17 BERNARD CHANIN (*admitted pro hac vice*)
 18 2052 Cherry Street
 19 Philadelphia, PA 19103
 20 Telephone: (215) 977-2396
 21 bchanin.esq@gmail.com
 22
 23 Attorneys for Defendant and Counter-Claimant
 24 STEPHEN GOULD CORPORATION

25 UNITED STATES DISTRICT COURT
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 27 NORTHERN DISTRICT OF CALIFORNIA
 28
 29 SAN FRANCISCO DIVISION

30 HYDROS BOTTLE LLC, a Delaware Limited
 31 Liability Company,
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 33 Plaintiff,
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 35 vs.
 36 STEPHEN GOULD CORPORATION, a New
 37 Jersey Corporation,
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 39 Defendant.

Case No.: 3:16-cv-04077-JST
**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER FOR EXTENSION OF PLAINTIFF
 AND COUNTER-DEFENDANT HYDROS'S
 TIME TO FILE MOTION FOR
 ATTORNEY'S FEES**

STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff and Counter-Defendant Hydros Bottle LLC

1 (“Hydros”) and Defendant and Counterclaimant Stephen Gould Corporation (“SGC”) hereby
2 stipulate and agree as follows:

3 WHEREAS, on April 3, 2017, the Clerk of the Court entered its Rule 68 Judgment in favor
4 of Hydros and against SGC;

5 WHEREAS, pursuant to FRCP Rule 54 and Local Rule 54, Hydros and SGC have been
6 meeting and conferring to resolve the issue of the amount of attorney’s fees;

7 WHEREAS, Hydros and SGC also have been meeting and conferring to resolve the amount
8 of prejudgment interest due to Hydros;

9 WHEREAS, Hydros’s motion to determine the amount of attorney’s fees is due today,
10 April 17, 2017;

11 WHEREAS, Hydros’s motion to determine the amount of prejudgment interest and thereby
12 to amend the judgment under FRCP Rule 59(e) to include that amount is due no later than May 1,
13 2017;

14 WHEREAS, the parties wish to have additional time to discuss the attorney’s fees and
15 prejudgment interest issues in an effort to resolve those matters without involving the Court, if
16 feasible;

17 WHEREAS, the parties agree that by entering into this stipulation, Hydros and SGC are not
18 waiving any rights, claims, or defenses; and

19 WHEREAS, there have been no previous time modifications Hydros’s time to move to
20 determine the amount of attorney’s fees due to Hydros and the change will not alter the date of any
21 event or any deadline already fixed by Court order.

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~~PROPOSED~~ ORDER

After consideration of the parties' Stipulated Request for an Order for Extension of Plaintiff and Counter-Defendant Hydros's Time to File Motion for Attorney's Fees, and good cause appearing,

IT IS HEREBY ORDERED THAT:

(1) Plaintiff and Counter-Defendant Hydros Bottle LLC shall have up to and including May 1, 2017 to move for a determination of the amount of attorney's fees to be awarded and/or otherwise move with respect to its request for attorney's fees.

IT IS SO ORDERED.

Dated: April 17, 2017



HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE