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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ICE CONSULTING, INC. *et al.*,

Plaintiffs,

v.

GAVIN JENSEN,

Defendant.

Case Number: 16-CV-04349-EMC

**STIPULATED REQUEST BY ALL
PARTIES TO CONTINUE THE
HEARING ON PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION
AND ORDER TO SHOW CAUSE ; AND
[PROPOSED] ORDER**

1 Plaintiffs ICE Consulting, Inc. (“ICE”), Uzair Sattar (“Sattar”), and Derick Needham
2 (“Needham”), and Defendant Gavin Jensen (“Jensen”), by and through their respective counsel,
3 hereby enter into this Stipulation to continue the hearing on Plaintiff ICE’s Motion for a Preliminary
4 Injunction and Order to Show Cause, currently set for hearing on August 18, 2016. The parties seek
5 such a continuation so that Defendant Jensen’s counsel, who was only retained on August 16, 2016,
6 may adequately prepare for any hearing on this matter, and submit an opposition.

7 WHEREAS, on August 3, 2016, Plaintiff ICE filed a Notice of Application and Application
8 for a Temporary Restraining Order and Notice of Motion and Motion for Preliminary Injunction and
9 Order to Show Cause, with supporting documents (Dkt. No. 6);

10 WHEREAS, on August 5, 2016, the Court issued an Order Granting Plaintiff’s *Ex Parte*
11 Application for a Temporary Restraining Order (“Order”) (Dkt. No. 19), which set a hearing on the
12 Court’s order to show cause on why a preliminary injunction should not issue for August 18, 2016;

13 WHEREAS, pursuant to the Court’s August 5, 2016 Order, Defendant Jensen was required to
14 submit any opposition to the Motion by August 12, 2016, and Plaintiff ICE was to submit any reply
15 papers by August 15, 2016;

16 WHEREAS, Defendant Jensen only retained counsel on August 16, 2016, and was unable to
17 submit an opposition by the time specified by the Court; and

18 WHEREAS, the parties have met and conferred and agree that the August 18, 2016 hearing
19 should be continued so that Defendant Jensen’s counsel may have time to prepare for any hearing on
20 this matter, and submit an opposition;

21 ACCORDINGLY, THE PARTIES HEREBY STIPULATE to the following:

22 That Plaintiff ICE’s Motion for a Preliminary Injunction be continued to September 15, 2016,
23 at 1:30 p.m., or as soon thereafter as the matter may be heard, in Courtroom 5 on the 17th floor of the
24 above-entitled court located at 450 Golden Gate Avenue, San Francisco, California 94102;

25 That Defendant Jensen shall file and serve any papers in opposition by September 6, 2016;
26 and

27 That Plaintiff ICE shall file and serve any reply papers by September 9, 2016;

28 That pursuant to the Court’s Order, the parties stipulate and Defendant Jensen consents to an

1 extension of the Temporary Restraining Order to remain in effect through 5:00 p.m. of the day after
2 the hearing on the Motion for Preliminary Injunction and Order to Show Cause.

3 IT IS SO STIPULATED.

4 Date: August 16, 2016

DHILLON LAW GROUP INC.

5 By: /s/ Nitoj P. Singh
6 Nitoj P. Singh

7 Attorneys for Defendant Gavin Jensen

8
9 Date: August 16, 2016

NOSSAMAN LLP

10 By: /s/ Veronica M. Gray
11 Veronica M. Gray
12 Andrew C. Crane

13 Attorneys for Plaintiffs Ice Consulting, Inc.;
14 Uzair Sattar; and Derick Needham

15
16 **ORDER**

17 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

18
19
20 Hon. Edward M. Chen
21 United States District Judge

