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 9 PASSPORTPARKING, INC.

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **OAKLAND DIVISION**

13 CARACAL ENTERPRISES LLC, and
 14 CARACAL CONSULTING INC.,

15 Plaintiffs,

16 v.

17 ROBERT SURANYI, ROBERT SURANYI
 18 SYSTEMS SUPPORT, PASSPORT, INC.
 19 and PASSPORTPARKING, INC.,

20 Defendants.

CASE NO. 3:16-CV-5073 (RS)

**STIPULATION AND ~~PROPOSED~~
 ORDER:**

- 21 **(1) EXTENDING TIME FOR**
DEFENDANT
PASSPORTPARKING, INC. TO
RESPOND TO THE FIRST
AMENDED COMPLAINT AND
- 22 **(2) EXTENDING TIME FOR THE**
CASE MANAGEMENT
CONFERENCE

23 Complaint Served: October 6, 2016

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 28 STIPULATION TO EXTEND TIME FOR
 PASSPORTPARKING, INC. TO RESPOND TO
 INITIAL COMPLAINT

Case No. 3:16-CV-5073 (RS)

1 Plaintiffs Caracal Enterprises LLC and Caracal Consulting Inc. (collectively “Plaintiffs”) and
2 defendant PassportParking, Inc. (“Passport”) hereby stipulate and agree that:

3 1. Plaintiffs and Passport are discussing the case and whether it can be resolved as between
4 them; and

5 2. Defendants Robert Suranyi and Robert Suranyi Systems Support were served using The
6 Hague Convention and have yet to enter an appearance beyond filing a stipulation extending their time
7 to respond to the complaint.

8 3. Accordingly, to avoid unnecessary expenditure of effort, and allow time for all parties to
9 appear, Plaintiffs have granted all defendants an additional 30-day extension of the deadline to answer or
10 otherwise respond to Plaintiffs’ First Amended Complaint. This is the second extension of time for
11 Passport and does not alter any deadlines already fixed by the Court.

12 4. For those same reasons, the Plaintiffs and Passport also agree, subject to court approval,
13 to extend the time for the Case Management Conference (“CMC) by sixty (60) days. The CMC is
14 currently scheduled for Thursday, December 15, 2016, and the parties agree to extend the CMC date
15 until Thursday, February 16, 2017 or as soon thereafter as is convenient for the court.

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17 DATED: November 29, 2016

GREENBERG TRAURIG, LLP

18 By: /s/ Ian C. Ballon
19 Ian C. Ballon

20 Attorneys for defendant
PASSPORTPARKING, INC.

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22 DATED: November 29, 2016

SMITH, GAMBRELL & RUSSELL, LLP

23 By: /s/ Edward A. Pennington
24 Edward A. Pennington (admitted *pro hac vice*)
25 John P. Pennington (admitted *pro hac vice*)
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Attorneys for Plaintiffs
CARACAL ENTERPRISES LLC and
CARACAL CONSULTING INC.

ATTESTATION CLAUSE

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I, Ian Ballon, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER: (1) EXTENDING TIME FOR DEFENDANT PASSPORTPARKING, INC. TO RESPOND TO THE FIRST AMENDED COMPLAINT AND (2) EXTENDING TIME FOR THE CASE MAMAGEMENT CONFERENCE. In compliance with Civil L.R. 5-1(i), I hereby attest that all signatories concurred in this filing.

DATED: November 29, 2016

GREENBERG TRAURIG, LLP

By: /s/ Ian C. Ballon
Ian C. Ballon

Attorneys for defendant
PASSPORTPARKING, INC.

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference is rescheduled for February 16, 2017 at 10:00 a.m. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.

Dated: November 30, 2016


Richard Seeborg
United States District Judge