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 CEPHEUS BIOSCIENCES, INC.

16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

18 ALLCELLS, LLC, a California Limited
 19 Liability Company

20 Plaintiff,

21 v.

22 JACK ZHAI, an individual, JAMES LEE, an
 23 individual, and CEPHEUS BIOSCIENCES,
 INC., a Delaware Company

24 Defendants.

Case No.: 3:16-cv-7323-EMC

JOINT STIPULATED REQUEST AND
[PROPOSED] ORDER TO STAY
PROCEEDINGS PENDING
CONSUMMATION OF SETTLEMENT
AGREEMENT

26 Defendants Jack Zhai, James Lee, and Cepheus Biosciences, Inc. (collectively
 27 “Defendants”) and Plaintiff AllCells, LLC (“Plaintiff”), through their undersigned attorneys,
 28 hereby jointly notify the Court that the parties have reached an agreement to settle this matter,

1 and respectfully request an order from the Court to stay proceedings for seven days so that the
2 parties can reduce the agreement to writing.

3 **JOINT DECLARATION OF THE PARTIES:**

- 4 1. The parties settled this matter during the Settlement Conference on April 17, 2017
5 before Chief Magistrate Judge Speiro and a binding settlement agreement has
6 been entered verbally into the record (D.I. 121).
- 7 2. The parties are currently working to reduce the agreement to writing and
8 anticipate filing a joint stipulation of settlement within seven days.
- 9 3. The deadline for Defendants to file their Answer and Counterclaims is currently
10 set for April 24, 2017.

11 **THEREFORE**, the parties jointly request that the Court stay all deadlines in this case for
12 seven days, specifically including the deadline for Defendants to file their Answer and
13 Counterclaims.

14 Dated: April 24, 2017

FINNEGAN, HENDERSON, FARABOW,
GARRETT, DUNNER, LLP

16 By: /s/ Lily Lim
17 Lily Lim
Attorneys for Defendant
18 CEPHEUS BIOSCIENCES, INC.

19 Dated: April 24, 2017

BURESH, KAPLAN, FELLER & CHANG

20 By: /s/ Peggy Chang
21 Peggy Chang
Attorneys for Defendant
22 CEPHEUS BIOSCIENCES, INC.

1 Dated: April 24, 2017

2 By: /s/ Mark S. Zhai
3 Mark S. Zhai
4 *Attorney for Defendants*
5 JACK ZHAI AND JAMES LEE

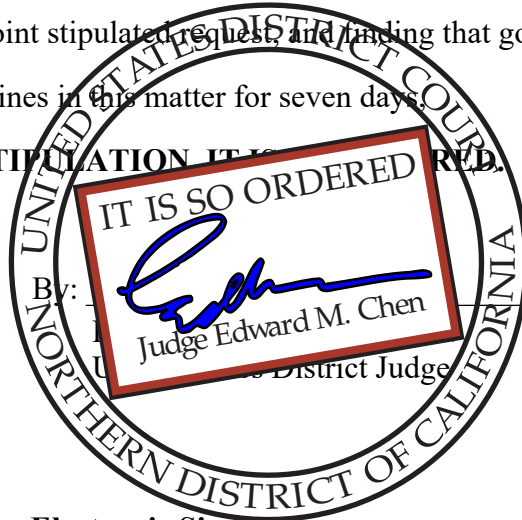
6 Dated: April 24, 2017

7 LILAW, INC.
8
9 By: /s/ J. James Li
10 J. James Li
11 *Attorney for Plaintiff*
12 ALLCELLS, LLC

13 Having considered the foregoing joint stipulated request, and finding that good cause
14 exists to stay this proceeding and all deadlines in this matter for seven days,

15 **PURSUANT TO THE JOINT STIPULATION IT IS SO ORDERED.**

16 Dated: 5/1 , 2017



17 **Attestation re Electronic Signatures**

18 I, Mark S. Zhai, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other
19 signatories to this document, on whose behalf this filing is submitted, concur in the filing's
20 content and have authorized this filing.

21 Dated: April 24, 2017

22 By: /s/ Mark S. Zhai
23 Mark S. Zhai