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8 *Counsel for MI Technologies, Inc. dba Discount Merchant,*
 9 *Amir Tafreshi, Innovative Enterprises, Inc. dba The*
 10 *Merchant King, and Joubin Rahimi*

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 FITBIT, INC., a Delaware corporation,

14 Plaintiff,

15 v.

16 LAGUNA 2, LLC, a New Jersey Limited
 17 Liability Company; JOEL BLANK, an
 18 individual; CALI RESOURCES, INC. dba
 19 BUY NOW FACTORY DIRECT, a California
 20 Corporation; CARLOS KELVIN, an
 21 individual; GREAT VALUE, LLC, a
 22 California Limited Liability Company; P-
 23 COVE ENTERPRISES INC. dba BUYERS
 24 CONSULTATION SERVICE, a California
 25 Corporation; ENVIRONMENTAL
 26 LIQUIDATION, INC., a California
 27 Corporation; JONATHAN MANHAN, an
 28 individual; FRANCIS MICHAEL BAKER aka
 MIKE BAKER, an individual; MI
 TECHNOLOGIES, INC. dba DISCOUNT
 MERCHANT, a California Corporation,
 AMIR TAFRESHI, an individual,
 INNOVATIVE ENTERPRISES, INC. dba
 THE MERCHANT KING, a California
 Corporation; JOUBIN RAHIMI, an individual,
 and DOES 12-30, inclusive,

Defendants.

Case No. 3:17-cv-00079 EMC

**SECOND STIPULATION AND
 [PROPOSED] ORDER ENLARGING TIME
 FOR DEFENDANTS MI
 TECHNOLOGIES, INC. dba DISCOUNT
 MERCHANT, AMIR TAFRESHI,
 INNOVATIVE ENTERPRISES, INC. dba
 THE MERCHANT KING, AND JOUBIN
 RAHIMI TO RESPOND TO SECOND
 AMENDED COMPLAINT**

Honorable Edward M. Chen

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Pursuant to Civil Local Rules 6-1(a), Plaintiff Fitbit, Inc. (“Fitbit”) and Defendants MI Technologies, Inc. dba Discount Merchant, Amir Tafreshi, Innovative Enterprises, Inc. dba The Merchant King, and Joubin Rahimi (collectively, the “MI Tech and Merchant King Defendants” and together with Fitbit, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, MI Tech and Merchant King Defendants agreed to accept service of the Second Amended Complaint (“SAC”), ECF No. 92, through their counsel on July 24, 2017;

WHEREAS, on July 25, 2017, pursuant to Civil L.R. 6-1(a), the Parties filed a Stipulation extending until September 13, 2017 the time for the MI Tech and Merchant King Defendants to respond to the SAC [Dkt. No. 95];

WHEREAS, counsel for the parties have engaged in meaningful settlement discussions;

WHEREAS, counsel for the parties believe that a further moderate extension of time for the MI Tech and Merchant King Defendants would be productive in permitting counsel to continue the settlement communications and determine whether there is a reasonable prospect of resolving the claims against the MI Tech and Merchant King Defendants without protracted litigation;

WHEREAS, the further extension being sought will not affect any pending Court dates;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that the deadline by which the MI Tech and Merchant King Defendants must answer or otherwise respond to the SAC shall be further extended to October 2, 2017.

IT IS SO STIPULATED.

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DATED: September 11, 2017

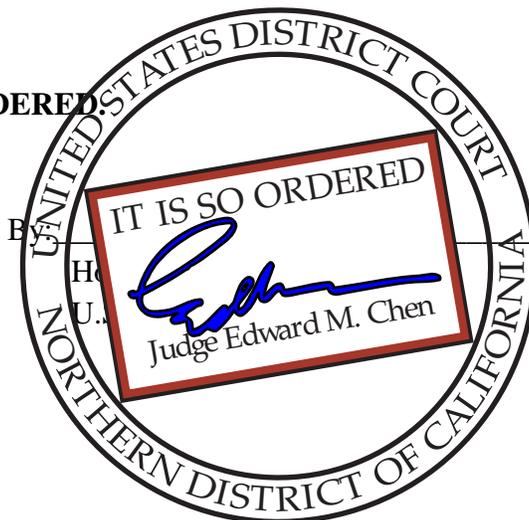
THE KATRIEL LAW FIRM
By: /s/ Roy A. Katriel
Roy A. Katriel
Attorneys for Defendants
MI Technologies, Inc. dba Discount Merchant,
Amir Tafreshi, Innovative Enterprises, Inc. dba
The Merchant King, and Joubin Rahimi

DATED: September 11, 2017

SIDEMAN & BANCROFT LLP
By : /s/ Zachary J. Alinder
Zachary J. Alinder
Attorneys for Plaintiff
Fitbit, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 9/15, 2017



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ECF ATTESTATION

I, Roy A. Katriel, attest that concurrence in e-filing this **SECOND STIPULATION
EXTENDING TIME FOR DEFENDANTS MI TECHNOLOGIES, AMIR TAFRESHI,
INNOVATIVE ENTERPRISES, AND JOUBIN RAHIMI TO RESPOND TO SECOND
AMENDED COMPLAINT** has been obtained from the signatories above, in compliance with
Civil L.R. 5.1.

/s/ Roy A. Katriel

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