

1 BROWN WHITE & OSBORN LLP
2 THOMAS M. BROWN (Bar No. 117449)
3 CALEB E. MASON (Bar No. 246653)
333 South Hope Street, 40th Floor
Los Angeles, California 90071-1406
Telephone: 213.613.0500
Facsimile: 213.613.0550
tbrown@brownwhitelaw.com
cmason@brownwhitelaw.com

6 Attorneys for Defendants
7 P-COVE ENTERPRISES INC. dba
8 BUYERS CONSULTATION SERVICE,
ENVIRONMENTAL LIQUIDATION,
INC., JONATHAN MANHAN and
FRANCIS MICHAEL BAKER

10 UNITED STATES DISTRICT COURT
11 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
individual; CALI RESOURCES, INC. dba
18 BUY NOW FACTORY DIRECT, a
California Corporation; CARLOS KELVIN,
an individual; GREAT VALUE, LLC, a
19 California Limited Liability Company; P-
COVE ENTERPRISES INC. dba BUYERS
20 CONSULTATION SERVICE, a California
Corporation; ENVIRONMENTAL
21 LIQUIDATION, INC., a California
Corporation; JONATHAN MANHAN, an
22 individual; FRANCIS MICHAEL BAKER
aka MIKE BAKER, an individual; MI
23 TECHNOLOGIES, INC. dba DISCOUNT
MERCHANT, a California Corporation,
24 AMIR TAFRESHI, an individual,
INNOVATIVE ENTERPRISES, INC. dba
25 THE MERCHANT KING, a California
Corporation; JOUBIN RAHIMI, an
26 individual, and DOES 12-30, inclusive,

27 Defendants.
28

Case No. 3:17-cv-00079-EMC

**STIPULATION REGARDING
CONSENT TO APPEAR
TELEPHONICALLY AT THE
DECEMBER 14, 2017 STATUS
CONFERENCE**

RECITALS

Defendants P-Cove Enterprises, Environmental Liquidation, Inc., Jonathan Manhan, and Francis Michael Baker (collectively “BCS Defendants”) and Cali Resources, Inc., Carlos Kelvin, Great Value, LLC, and Carlos Kelvin (collectively “Cali Defendants”) request permission to appear telephonically for the December 14, 2017 Status Conference and any other proceedings on that date. There is good cause for this request because the BCS and Cali Defendants, and their counsel, are all located in Southern California, and this case is being heard in San Francisco.

STIPULATION

The parties, through their undersigned counsel, hereby stipulate and agree that Defendants P-Cove Enterprises Inc. dba Buyers Consultation Service, Environmental Liquidation, Inc., Jonathan Manhan, and Francis Michael Baker, Cali Resources, Inc., Carlos Kelvin, Great Value, LLC, and Carlos Kelvin, may appear telephonically at the December 14, 2017 status conference and any other proceedings on that date.

A proposed order is attached hereto.

DATED: Nov. 8, 2017

Respectfully submitted,

BROWN WHITE & OSBORN LLP

By /s/ Caleb E. Mason

CALEB E. MASON
 Attorneys for Defendants
 P-Cove Enterprises, Environmental
 Liquidation, Inc., Jonathan Manhan, and
 Francis Michael Baker

DATED: Nov. 8, 2017

SIDEMAN & BANCROFT LLP

By /s/ Zachary J. Alinder

ZACHARY J. ALINDER
 Attorneys for Plaintiff
 Fitbit, Inc.

1
2 DATED: Nov. 8, 2017

MAURIEL KAPOUYTIAN WOODS

3 By /s/ Sherman W. Kahn

4 SHERMAN W. KAHN
5 Attorneys for Defendants
6 Laguna 2, LLC and
7 Joel Blank

8 DATED: Nov. 8, 2017

ONE LLP

9 By /s/ Stephen M. Lobbin

10 STEPHEN MICHAEL LOBBIN
11 Attorneys for Defendants
12 Cali Resources, Inc., Carlos Kelvin, Great
13 Value, LLC, and Carlos Kelvin

14 DATED: Nov. 8, 2017

THE KATRIEL LAW FIRM

15 By /s/ Roy A. Katriel

16 ROY ARIE KATRIEL
17 Attorneys for Defendants
18 MI Technologies, Inc., Innovative
19 Enterprises, Inc., and Joubin Rahimi

BROWN WHITE & OSBORN LLP
THOMAS M. BROWN (Bar No. 117449)
CALEB E. MASON (Bar No. 246653)
333 South Hope Street, 40th Floor
Los Angeles, California 90071-1406
Telephone: 213.613.0500
Facsimile: 213.613.0550
tbrown@brownwhitelaw.com
cmason@brownwhitelaw.com

Attorneys for Defendants
P-COVE ENTERPRISES INC. dba
BUYERS CONSULTATION SERVICE,
ENVIRONMENTAL LIQUIDATION,
INC., JONATHAN MANHAN and
FRANCIS MICHAEL BAKER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FITBIT, INC., a Delaware Corporation,

Plaintiff,

v.

Case No. 3:17-cv-00079-EMC

LAGUNA 2, LLC, a New Jersey Limited
Liability Company; JOEL BLANK, an
individual; CALI RESOURCES, INC. dba
BUY NOW FACTORY DIRECT, a
California Corporation; CARLOS KELVIN,
an individual; GREAT VALUE, LLC, a
California Limited Liability Company; P-
COVE ENTERPRISES INC. dba BUYERS
CONSULTATION SERVICE, a California
Corporation; ENVIRONMENTAL
LIQUIDATION, INC., a California
Corporation; JONATHAN MANHAN, an
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,

~~[PROPOSED]~~ ORDER

Defendants.

[PROPOSED] ORDER

Upon consideration of the consent Motion for Administrative Relief and the accompanying stipulation of the parties, requesting to appear telephonically at the December 14, 2017 status conference and any other proceedings on that date.

PURSUANT TO STIPULATION, IT IS SO ORDERED,

Requested parties shall contact Courtcall at (866)582-6878 to set up the conference call and obtain the call in number.

DATE: 11/17/17

Hon. Edward M. Chen
United States District Judge

4844-0176-7507, v. 1

