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Attorneys for Defendants Cali Resources, Inc., Carlos Kelvin and Great Value, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FITBIT, INC., a Delaware corporation,

Plaintiff,

v.

LAGUNA 2, LLC, a New Jersey Limited Liability Company; JOEL BLANK, an individual; CALI RESOURCES, INC., a California corporation; CARLOS KELVIN, GREAT VALUE, LLC, a California Limited Liability Company; P-COVE ENTERPRISES INC. dba BUYERS CONSULTATION SERVICES, 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, California corporation; AMIR TAFRESHI, an individual, INNOVATION 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

STIPULATION REGARDING CONSENT TO APPEAR TELEPHONICALLY AT THE MARCH 22, 2018 HEARING ON THE MOTION FOR DETERMINATION OF GOOD FAITH SETTLEMENT AND STATUS CONFERENCE

Date: March 22, 2018
Time: 1:30 p.m.
Ct rm: 5, 17TH Floor

Honorable Edward M. Chen

1 Defendants Cali Resources, Inc., Carlos Kelvin, and Great Value, LLC (collectively “Cali
2 Defendants”) and P-Cove Enterprises, Environmental Liquidation, Inc., Jonathan Manhan, and
3 Francis Michael Baker (collectively, “BCS Defendants”) request permission to appear
4 telephonically for the March 22, 2018 hearing on the Motion for Determination of Good Faith
5 Settlement, Status Conference and any other proceedings on that date. There is good cause for
6 this request because Cali Defendants’ counsel is located in Jupiter, Florida, and BCS Defendants’
7 counsel is located in Los Angeles, California, and this case is being heard in San Francisco.

8 **STIPULATION**

9 The parties, through their undersigned counsel, hereby stipulate and agree that Cali
10 Defendants’ and BCS Defendants’ counsel may appear telephonically at the March 22, 2018
11 hearing on the Motion for Determination of Good Faith Settlement, Status Conference and any
12 other proceedings on that date.

13 A proposed order is attached hereto.

14 Dated: February 21, 2018

Respectfully submitted,

15 AVYNO LAW, P.C.

16 /s/ Edward F. O’Connor

17 Edward F. O’Connor

Stephen M. Lobbin

Attorney for Defendants

18 Cali Resources, Inc., Carlos Kelvin and

19 Great Value LLC

20 Dated: February 21, 2018

SIDEMAN & BANCROFT LLP

21 /s/ Zachary J. Alinder

22 Zachary J. Alinder

Attorney for Plaintiff

23 Fitbit, Inc.

24 Dated: February 21, 2018

BROWN WHITE & OSBORN LLP

25 /s/ Caleb E. Mason

26 Caleb E. Mason

Attorneys for Defendants

27 P-Cove Enterprises, Environmental

Liquidation, Inc., Jonathan Manhan, and

28 Francis Michael Baker

1 Dated: February 21, 2018

MAURIEL KAPOUYTIAN WOODS

2
3 /s/ Sherman W. Kahn

4 Sherman W. Kahn

5 *Attorneys for Defendants*

6 Laguna 2, LLC and Joel Blank

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Case No. 3:17-cv-00079 EMC

[~~PROPOSED~~] ORDER

Date: March 22, 2018
Time: 1:30 p.m.
Ctroom: 5, 17TH Floor

Honorable Edward M. Chen

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Dated: February 21, 2018 /s/ Edward F. O'Connor