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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 FITBIT, INC., a Delaware Corporation,  
12 Plaintiff,  
13 v.  
14 LAGUNA 2, LLC, A New Jersey Limited  
Liability Company; JOEL BLANK, an  
15 individual; CALI RESOURCES, INC., a  
California Corporation; CARLOS KELVIN,  
16 an individual; and, DOES 3-30, inclusive,  
17 Defendants.  
18 CALI RESOURCES, INC., a California  
19 Corporation,  
20 Counterclaimant,  
21 v.  
22 FITBIT, INC., a Delaware Corporation,  
23 Counter-Defendant.  
24

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

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR CALI  
AND L2 TO RESPOND TO SECOND  
AMENDED COMPLAINT**

Judge: Honorable Edward M. Chen  
Dept.: Courtroom 5, 17th Floor

26 Pursuant to Civil Local Rule 6-1, Plaintiff and Counter-Defendant Fitbit, Inc. (“Fitbit”),  
27 Defendant and Counterclaimant Cali Resources, Inc. and Defendant Carlos Kelvin (together  
28 “Cali”), and Defendants Laguna 2, LLC and Joel Blank (together, “L2” and collectively with

1 Fitbit and Cali, the “Parties”), by and through their respective counsel of record, hereby stipulate  
2 as follows:

3 WHEREAS, Cali and L2 currently have until August 14, 2017 to respond to Plaintiff’s  
4 Second Amended Complaint (“SAC”), which was originally set to be filed July 14, 2017, but  
5 which date was extended to July 21, 2017 pursuant to Fitbit’s request, the parties’ stipulation, and  
6 this Court’s Order (*see* ECF No. 91);

7 WHEREAS, Cali and L2 have requested, and Fitbit has no objection to, an equal, short  
8 one-week extension of time to file their responses to the SAC, from August 14, 2017 to August  
9 21, 2017; and,

10 WHEREAS, the proposed one-week extension will not alter the date of any event or any  
11 deadline already fixed by Court Order.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the Parties,  
13 through their respective counsel of record, that the deadline for Cali and L2 to respond to the SAC  
14 should be extended by one week to August 21, 2017.

15 **IT IS SO STIPULATED.**

16 DATED: July 25, 2017

SIDEMAN & BANCROFT LLP

17 By:                   /s/ Zachary J. Alinder                    
18 Zachary J. Alinder  
19 *Attorneys for Plaintiff and Counter-Defendants*  
FITBIT, INC.

20 DATED: July 25, 2017

MAURIEL KAPOUYTIAN WOODS LLP

21 By:                   /s/ Jason R. Bartlett                    
22 Jason R. Bartlett  
23 *Attorneys for Defendants*  
LAGUNA 2, LLC and JOEL BLANK

24 DATED: July 25, 2017

ONE LLP

25 By:                   /s/ Stephen M. Lobbin                    
26 Stephen M. Lobbin  
27 *Attorneys for Defendants and Counterclaimants*  
28 CALI RESOURCES, INC. and CARLOS KELVIN

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

7/28/17

Dated: \_\_\_\_\_



