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10 Attorneys for Defendant
 INTELLICHECK, LLC

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT CALIFORNIA

14 JAMES CUNHA, an individual, on behalf of
 15 himself and all others similarly situated,

16 Plaintiff,

17 v.

18 INTELLICHECK, LLC, a California Limited
 Liability Company; PROPACIFIC FRESH, INC.,
 19 a California Corporation, and DOES 1-100,

20 Defendants.

Case No. 1:17-cv-00597-JST

**STIPULATION TO EXTEND TIME FOR
 DEFENDANT INTELLICHECK, LLC TO
 RESPOND TO THE FIRST AMENDED
 COMPLAINT**

*[Filed concurrently with (1) Declaration of
 Selyn Hong; and (2) [Proposed] Order]*

Judge: Hon. Jon S. Tigar

Complaint Filed: December 20, 2016
 First Amended Complaint Filed: March 3, 2017
 Trial Date: None Set

1 Pursuant to the Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff James Cunha and Defendant
2 IntelliCheck, LLC (“IntelliCheck”), by and through their counsel, hereby stipulate as follows:

3 1. The current deadline for IntelliCheck to respond to Plaintiff’s First Amended Complaint
4 is March 31, 2017.

5 2. IntelliCheck intended to file a Rule 12(b)(6) motion to dismiss, and Plaintiff and
6 IntelliCheck agree that continuing to explore the potential for early resolution would be in their
7 respective best interests. Plaintiff and IntelliCheck wish to continue efforts at informal resolution and to
8 avoid the time and costs associated with the filing and opposing of a motion to dismiss.

9 3. Plaintiff and IntelliCheck remain actively engaged in settlement discussions and
10 anticipate having a resolution in the next 14 days or, if necessary, to proceed with a motion to dismiss.

11 4. To allow Plaintiff and IntelliCheck additional time to resolve the matter, Plaintiff and
12 IntelliCheck further agree to extend the time for IntelliCheck to respond to Plaintiff’s First Amended
13 Complaint by two weeks, from March 31, 2017 to April 14, 2017.

14 5. This is Plaintiff and IntelliCheck’s second request for an extension of time for
15 IntelliCheck to file a response to the First Amended Complaint.

16 6. This stipulated request will not affect any other date or deadline in this case.

17 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

18 Date: March 29, 2017

KEEGAN & BAKER LLP

19 */s/ Patrick N. Keegan*

20 Patrick N. Keegan
21 James M. Treglio
22 Attorney for Plaintiff
23 JAMES CUNHA

24 Date: March 29, 2017

SEYFARTH SHAW LLP

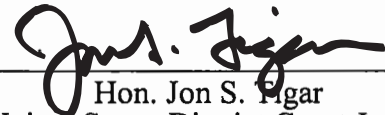
25 */s/ Selyn Hong*

26 Pamela Q. Devata
27 John W. Drury
28 Selyn Hong
Attorney for Defendant
INTELLICHECK, LLC

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline for Defendant IntelliCheck, LLC to respond to Plaintiff James Cunha's First Amended Complaint is extended from March 31, 2017 to April 14, 2017.

DATED: March 30, 2017



Hon. Jon S. Pagar
United States District Court Judge