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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 POP MIDDLE EAST, INC., a foreign
 corporation,
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 Plaintiff,
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 v.
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 POPSUGAR INC., a Delaware corporation;
 17 EBATES INC., a Delaware corporation,,
 18
 Defendants.

Case No. 3:17-cv-02015-WHA
**JOINT STIPULATION TO ENLARGE
 TIME RE MOTION TO DISMISS AND
 INITIAL CASE MANAGEMENT
 CONFERENCE; ~~PROPOSED~~ ORDER**
 Complaint Filed: April 11, 2017
 Trial Date: None Set

20 Plaintiff Pop Middle East, Inc., Defendant POPSUGAR Inc., and Defendant Ebates, Inc.,
 21 by and through their respective counsel of record, stipulate as follows:

22 WHEREAS, Plaintiff Pop Middle East, Inc. (hereinafter "Plaintiff") filed its Complaint on
 23 April 11, 2017 [Dkt 1];

24 WHEREAS, Plaintiff served the Complaint on Defendants POPSUGAR, Inc. and Ebates,
 25 Inc. on April 13, 2017, and a responsive pleading was due on or about May 4, 2017 [Dkts. 7-1
 26 and 7-2];

1 WHEREAS, on April 21, 2017, Plaintiff agreed to extend Defendants' time to answer or
2 otherwise respond to the complaint by 21 days, up to and including May 25, 2017 [Dkt. 11];

3 WHEREAS, on May 5, 2017, the Court scheduled an Initial Case Management
4 Conference for July 13, 2017;

5 WHEREAS, on May 18, 2017, Plaintiff agreed to a further extension of time for
6 Defendants to answer or otherwise plead to the complaint, up to and including June 15, 2017
7 [Dkt. 19];

8 WHEREAS, on June 15, 2017, Defendants POPSUGAR, Inc. and Ebates filed and served
9 their motions to dismiss, with a hearing date of July 27, 2017;

10 WHEREAS, Plaintiff's oppositions to the motions to dismiss are due June 29, 2017, and
11 Defendants' replies are due July 6, 2017;

12 WHEREAS, the parties are currently in the midst of settlement negotiations and require
13 additional time to draft and agree upon the terms of a settlement;

14 WHEREAS, in order to facilitate further settlement negotiations, the parties have agreed
15 to extend the deadlines (i) for Plaintiff's oppositions to Defendants' motions to dismiss to July 31,
16 2017, (ii) for Defendants' replies to August 7, 2017, (iii) to continue the hearing date on
17 Defendants' motions to dismiss to August 17, 2017 at 8:00 a.m., or to such other date as the court
18 has available; and (iv) request that the Initial Case Management Conference be continued from
19 July 13, 2017 to a future date, along with the F.R.C.P. Rule 26(f) deadlines;

20 WHEREFORE, pursuant to Civil Local Rule 6-2, the parties stipulate and agree that:

- 21 1. Plaintiff's time to file its opposition to Defendants' motions to dismiss shall be
22 extended to **July 31, 2017**;
 - 23 2. Defendants' time to file its replies shall be extended to **August 7, 2017**;
 - 24 3. That the hearing on Defendants' motions to dismiss be continued to **August 17,**
25 **2017 at 8:00 a.m.**, or to such other date as the Court has available; and
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1 4. That the currently scheduled Initial Case Management Conference set for July 13,
2 2017 also be continued to **August 17, 2017**, or to such other date as the Court has available, along
3 with the F.R.C.P. Rule 26(f) deadlines.

4
5 Dated: June 27, 2017

PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP

6
7 By /s/ David M. Given
DAVID M. GIVEN

8 KLARIS LAW PLLC
Edward Klaris (admitted *pro hac vice*)

9
10 By /s/ Edward J. Klaris
EDWARD J. KLARIS

11 Attorneys for Plaintiff
POP MIDDLE EAST INC.

12
13 Dated: June 27, 2017

KEKER, VAN NEST & PETERS LLP

14 By /s/ Benedict Y. Hur
BENEDICT Y. HUR
JAY RAPAPORT

15
16 Attorneys for Defendant
POPSUGAR, INC.

17
18 Dated: June 27, 2017

THE LAW OFFICES OF THOMAS V. CHRISTOPHER

19 By /s/ Thomas V. Christopher
THOMAS V. CHRISTOPHER

20
21 Attorneys for Defendant
EBATES, INC.

22 **ATTESTATION**

23 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on
24 whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

25 Dated: June 27, 2017

26 /s/ Edward J. Klaris
Edward J. Klaris

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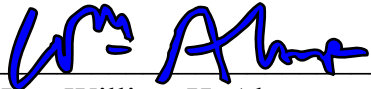
~~PROPOSED~~ ORDER GRANTING STIPULATION

PURSUANT TO STIPULATION, IT IS ORDERED that:

- 1. Plaintiff's time to file its opposition to Defendants' motions to dismiss shall be extended from June 29, 2017 to **July 31, 2017**;
- 2. Defendants' time to file its replies shall be extended from July 6, 2017 to **August 7, 2017**;
- 3. That the hearing on Defendants' motions to dismiss to be continued from July 27, 2017 to **August 17, 2017 at 8:00 a.m.**, ~~or to~~ _____;
- 4. That the Initial Case Management Conference set for July 13, 2017 be continued **August 17, 2017**, ~~or to~~ _____ at 11:00 A.M., along with the F.R.C.P. Rule 26(f) deadlines.

SO ORDERED.

Dated: June 29, 2017.



Hon. William H. Alsup
United States District Judge