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13  
 14 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**

16 FREE STREAM MEDIA CORP.  
 d/b/a SAMBA TV,  
 17  
 18 Plaintiff,

19 v.

20 ALPHONSO INC., ASHISH CHORDIA,  
 RAGHU KODIGE, and LAMPROS  
 KALAMPOUKAS,  
 21  
 22 Defendants.

Case No. 17-cv-02107-RS

**CIVIL L.R. 6-2 STIPULATION AND**  
**[PROPOSED] ORDER SHORTENING**  
**TIME FOR BRIEFING AND HEARING**  
**ON DEFENDANTS’ MOTION FOR**  
**RELIEF FROM CASE MANAGEMENT**  
**SCHEDULE (ECF NO. 228);**

**DECLARATION OF VALERIE RODDY**  
**IN SUPPORT THEREOF**

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1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Free Stream Media d/b/a Samba TV  
2 (“Samba”) and Defendants Alphonso Inc., Ashish Chordia, Lampros Kalampoukas, and Raghu  
3 Kodige (collectively, “Defendants”) submit this stipulated request that the Court shorten the  
4 briefing and hearing schedule for Defendants’ Motion for Relief from Case Management Schedule  
5 (ECF No. 228):

6 **STIPULATION**

7 WHEREAS, on September 22, 2017, Defendants filed a Motion for Relief from Case  
8 Management Schedule (ECF No. 228);

9 WHEREAS, Defendants’ motion requests that the Court hold in abeyance case  
10 management dates pending resolution of Plaintiff’s Motion for Leave to Amend Its Infringement  
11 Contentions (ECF No. 214), scheduled for hearing on October 26, 2017;

12 WHEREAS, a number of case management deadlines are imminent, including the deadline  
13 for serving initial expert disclosures (September 29, 2017);<sup>1</sup> the deadline for rebuttal and  
14 supplemental expert disclosures (October 20 or 27, 2017); the cutoff for expert discovery  
15 (November 3 or 10, 2017); and the deadline for filing summary judgment motions (November 16,  
16 2017);

17 WHEREAS, Defendants contend there is good cause to shorten time for the briefing and  
18 hearing of their motion for the reasons set forth in the attached Declaration of Valerie Roddy,  
19 which also sets forth all previous time modifications in this case;

20 WHEREAS, Plaintiff opposes Defendants’ motion to hold in abeyance case management  
21 dates, but does not oppose its expedited resolution in view of the imminence of the case  
22 management dates it seeks to impact; and

23 WHEREAS, the parties will be before the Court on October 5, 2017 at 1:30 p.m. for a  
24 hearing on Defendants’ motion to dismiss the Second Amended Complaint, *see* ECF No. 231

25 \_\_\_\_\_  
26 <sup>1</sup> On September 20, 2017, the parties filed a joint stipulation and [proposed] order (ECF  
27 No. 220) seeking to extend all expert disclosure and discovery deadlines by one week. Pending  
28 the Court’s decision on that motion, the parties have agreed to waive any objection to initial expert  
disclosures (due September 22, 2017 under the operative case management schedule (*see* ECF  
No. 148)) being served through and until September 29, 2017, the deadline requested in the  
parties’ stipulation.

1 The parties hereby request that the Court set the following briefing and hearing schedule  
2 for Defendants' Motion for Relief from Case Management Schedule (ECF No. 228):

3 1. Any opposition to Defendants' Motion for Relief from Case Management Schedule  
4 (ECF No. 228) shall be filed on or before October 2, 2017.

5 2. Any reply in support of Defendants' Motion for Relief from Case Management  
6 Schedule (ECF No. 228) shall be filed on or before October 3, 2017. Any such reply shall be  
7 limited to no more than 4 pages in length.

8 3. Any hearing on Defendants' Motion for Relief from Case Management Schedule  
9 (ECF No. 228) shall be held on October 5, 2017 at 1:30 p.m., or at such time as the Court may  
10 order.

11 DATED: September 27, 2017

TENSEGRITY LAW GROUP, LLP

12  
13 By /s/ William P. Nelson

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*Free Stream Media Corp. d/b/a Samba TV*

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DATED: September 27, 2017

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Claude M. Stern  
Claude M. Stern  
*Attorneys for Defendants Alphonso Inc., Ashish  
Chordia, Lampros Kalampoukas, and Raghu  
Kodige*

1 **~~PROPOSED~~ ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED.

3 1. Any opposition to Defendants' Motion for Relief from Case Management Schedule  
4 (ECF No. 228) shall be filed on or before October 2, 2017.

5 2. Any reply in support of Defendants' Motion for Relief from Case Management  
6 Schedule (ECF No. 228) shall be filed on or before October 3, 2017. Any such reply shall be  
7 limited to no more than 4 pages in length.

8 3. Any hearing on Defendants' Motion for Relief from Case Management Schedule  
9 (ECF No. 228) shall be held on October 5, 2017 at 1:30 p.m.

10 DATED: September 28, 2017

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12  
13 Hon. Richard Seeborg  
14 UNITED STATES DISTRICT COURT JUDGE