

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
 A Limited Liability Partnership
 2 Including Professional Corporations
 3 JENNIFER G. REDMOND, Cal. Bar No. 144790
 jredmond@sheppardmullin.com
 4 PAUL S. COWIE, Cal. Bar No. 250131
 pcowie@sheppardmullin.com
 5 JOHN-PAUL S. DEOL, Cal. Bar No. 284893
 jdeol@sheppardmullin.com
 6 Four Embarcadero Center, 17th Floor
 7 San Francisco, CA 94111-4109
 Telephone: 415.434.9100
 8 Facsimile: 415.434.3947

9 Attorneys for Plaintiff
 10 META COMPANY

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

14 META COMPANY, a Delaware corporation,
 15 Plaintiff,
 16 v.
 17 ZHANGYI ZHONG (a.k.a. Zhangyi “Johnny”
 18 Zhong, a.k.a. Zhangyi “Kevin” Zhong), an
 19 individual, DREAMWORLD USA INC., a
 20 Delaware corporation, and DOES 1 through
 21 Defendants.

Case No. 3:17-cv-03259-EMC

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINES RE
 MOTION FOR EXPEDITED DISCOVERY
 AND MOTION TO DISMISS**

22
 23
 24
 25
 26
 27
 28

1 Pursuant to Local Rule 6-2 of the Northern District of California, Defendants Zhangyi Zhong
2 and Dreamworld USA Inc. (“Defendants”) and Plaintiff Meta Company (“Meta” or “Plaintiff”)
3 hereby stipulate to move the hearing dates and extend the briefing deadlines on Plaintiff’s Motion
4 for Expedited Discovery (“Expedited Discovery Motion”) (Dkt. No. 21) and Defendant’s Motion to
5 Dismiss (“Motion to Dismiss”) (Dkt. No. 38).

6 WHEREAS, the Parties are currently attempting to informally resolve the above-captioned
7 lawsuit (Deol Decl., ¶ 2);

8 WHEREAS, the Parties wish to avoid spending additional time and effort in briefing and
9 attending a hearing on the Expedited Discovery Motion and Motion to Dismiss in the event this case
10 can be informally resolved (Deol Decl., ¶ 3);

11 WHEREAS the Expedited Discovery Motion is set for hearing on August 3, 2017;

12 WHEREAS the Motion to Dismiss is set for hearing on August 17, 2017;

13 WHEREAS, Plaintiff’s opposition to the Motion to Dismiss is currently due on July 21,
14 2017;

15 WHEREAS, Defendants’ reply in support of the Motion to Dismiss is currently due on July
16 28, 2017;

17 WHEREAS, there have been no previous time modifications in this case, with the exception
18 of a short extension of time for Defendants to file a response to the Complaint (Deol Decl., ¶ 4);

19 WHEREAS, counsel for both Parties agree that the requested extension would not affect any
20 other deadlines in this case (Deol Decl., ¶ 5); and

21 WHEREAS, Civil Local Rule 6-2(a) of the Northern District of California states, “The
22 parties may file a stipulation ... requesting an order changing time that would affect the date of an
23 event or deadline already fixed by Court order, or that would accelerate or extend time frames set
24 in the Local Rules or in the Federal Rules.”

25 NOW, THEREFORE, in consideration of the foregoing, the Parties agree and hereby
26 stipulate that:

27 (1) the hearing on the Expedited Discovery Motion be continued to August 24, 2017;

28

- 1 (2) the hearing on the Motion to Dismiss be continued to August 31, 2017; 10
2 (3) Plaintiff may file its opposition to the Motion to Dismiss by no later than August ~~18,~~
3 2017; 17
4 (4) Defendants may file their reply to the Motion by no later than August ~~25,~~ 2017; and
5 (5) Plaintiff shall maintain its right to amend its Complaint without leave of Court until
6 August 18, 2017.

7 **IT IS SO STIPULATED.**

8
9 Dated: July 19, 2017

Respectfully submitted,

10
11 */s/ Rick C. Chang*

12 Rick C. Chang (SBN 209515)
13 rchang@foley.com
14 Duane H. Mathiowetz (SBN 111831)
15 dmathiowetz@foley.com
16 FOLEY & LARDNER LLP
17 555 California Street, #1700
18 San Francisco, CA 94104

Counsel for Zhangyi Zhong and
Dreamworld USA Inc.

19
20 */s/ John-Paul S. Deol*

21 Jennifer G. Redmond (SBN 144790)
22 jredmond@sheppardmullin.com
23 Paul S. Cowie (SBN 250131)
24 pcowie@sheppardmullin.com
25 John-Paul S. Deol (SBN 284893)
26 jdeol@sheppardmullin.com
27 SHEPPARD, MULLIN, RICHTER &
28 HAMPTON LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109

Counsel for Meta Company

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~ ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED. Opposition for motion to dismiss due 8/10/17. Reply due 8/17/17.

Dated: 7/19/17

Hon. Edward M. Chen
U.S. District Judge

