SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 1 A Limited Liability Partnership 2 **Including Professional Corporations** JENNIFER G. REDMOND, Cal. Bar No. 144790 3 jredmond@sheppardmullin.com PAUL S. COWIE, Cal. Bar No. 250131 pcowie@sheppardmullin.com 5 JOHN-PAUL S. DEOL, Cal. Bar No. 284893 ideol@sheppardmullin.com Four Embarcadero Center, 17th Floor San Francisco, CA 94111-4109 Telephone: 415.434.9100 Facsimile: 415.434.3947 8 Attorneys for Plaintiff 9 META COMPANY 10 11 UNITED STATES DISTRICT COURT 12 NORTHERN DISTRICT OF CALIFORNIA 13 SAN FRANCISCO DIVISION 14 META COMPANY, a Delaware corporation, Case No. 3:17-cv-03259-EMC 15 Plaintiff. STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES RE 16 MOTION FOR EXPEDITED DISCOVERY v. AND MOTION TO DISMISS 17 ZHANGYI ZHONG (a.k.a. Zhangyi "Johnny" 18 Zhong, a.k.a. Zhangyi "Kevin" Zhong), an individual, DREAMWORLD USA INC., a 19 Delaware corporation, and DOES 1 through 20. 20 Defendants. 21 22 23 24 25 26 27 28 Case No. 3:17-cv-03259-EMC SMRH:483831657.1 STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES RE MOTION FOR

EXPEDITED DISCOVERY AND MOTION TO DISMISS

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Meta Company v. Zhong et al

1	Pursuant to Local Rule 6-2 of the Northern District of California, Defendants Zhangyi Zhon			
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 have tentatively resolved the above-captioned lawsuit (Deol Decl.			
7	\P 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, given that the case			
0	has tentatively been resolved (Deol Decl., ¶ 3);			
1	WHEREAS the Expedited Discovery Motion is set for hearing on August 24, 2017;			
12	WHEREAS the Motion to Dismiss is set for hearing on September 14, 2017;			
13	WHEREAS, Plaintiff's opposition to the Motion to Dismiss is currently due on August 24			
4	2017;			
15	WHEREAS, Defendants' reply in support of the Motion to Dismiss is currently due or			
16	August 31, 2017;			
17	WHEREAS, there have been two previous extensions of time while the Parties have			
18	endeavored to settle this matter (Deol Decl., ¶ 4);			
9	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 ar			
23	event or deadline already fixed by Court order, or that would accelerate or extend time frames see			
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 October 19, 2017;			
28				

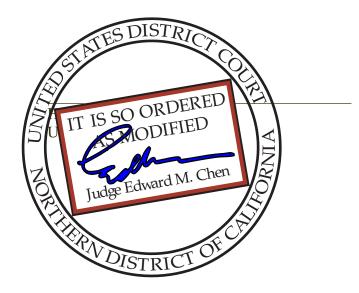
1	(2) the hearing on the Motion to Dismiss be continued to October 26, 2017;			
2	(3) Plaintiff may file its opposition to the Motion to Dismiss by no later than October 5			
3	2017;			
4	(4) Defendants may file their reply to the Motion by no later than October 12, 2017; and			
5	(5)	Plaintiff shall maintain its right to amend its Complaint without leave of Court until		
6	October 5, 2017.			
7	IT IS SO STIPULATED.			
8				
9	Dated: Aug	gust 21, 2017 Respectfully submi	tted,	
10		/s/ Piak C. Chana		
11		/s/ Rick C. Chang	DN 200515)	
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24		Counsel for Meta	Company	
25				
26				
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28		-2-	Case No. 3:17-cv-03259-EMC	
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[PROPOSED] ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED. (as amended on p. 1)

Dated: _ 8/22/17



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

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