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 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**

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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 have tentatively resolved the above-captioned lawsuit (Deol Decl.,
7 ¶ 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
10 has tentatively been resolved (Deol Decl., ¶ 3);

11 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,
14 2017;

15 WHEREAS, Defendants’ reply in support of the Motion to Dismiss is currently due on
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);

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 October 19, 2017;

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- 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.**

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9 Dated: August 21, 2017

Respectfully submitted,

10
11 /s/ Rick C. Chang

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Counsel for Meta Company

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~~PROPOSED~~ ORDER

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

Dated: 8/22/17

