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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

18 hiQ Labs, Inc.,
 19 Plaintiff,
 20 vs.
 21 LinkedIn Corp.,
 22 Defendant.

Case No. 3:17-cv-03301-EMC
**STIPULATION AND [PROPOSED]
 ORDER CONTINUING INITIAL CASE
 MANAGEMENT CONFERENCE**
 The Hon. Edward M. Chen
 Trial Date: TBD

27 *Affiliation noted for identification purposes only.

1 Plaintiff hiQ Labs, Inc. (“hiQ”) and Defendant LinkedIn Corporation (“LinkedIn”) hereby
2 stipulate as follows:

3 WHEREAS, the initial case management conference in this matter is currently set for
4 Thursday, September 14, 2017 at 9:30 a.m. (Dkt. 60);

5 WHEREAS, the parties held their Rule 26 conference on August 24, 2017 and have been
6 diligently meeting and conferring on substantive issues since then;

7 WHEREAS, hiQ anticipates that attorneys from the law firm of Boies Schiller Flexner
8 LLP will be joining the case and representing hiQ as co-counsel with its current attorneys;

9 WHEREAS, hiQ has requested and LinkedIn does not oppose a two-week extension of the
10 initial case management conference so that hiQ’s new attorneys from Boies Schiller Flexner LLP
11 can get up to speed and meaningfully assist in developing a strategy and case management plan;

12 WHEREAS, LinkedIn intends to file a motion to dismiss some of the causes of action in
13 hiQ’s complaint on or before September 13, 2017;

14 WHEREAS, hiQ has requested and LinkedIn does not oppose extending the briefing
15 schedule on LinkedIn’s motion to dismiss so that hiQ’s attorneys from Boies Schiller Flexner can
16 get up to speed and meaningfully assist in responding to LinkedIn’s motion to dismiss;

17 THEREFORE, for good cause, the parties hereby stipulate and agree:

18 (1) The initial case management conference shall be continued to September 28, 2017 at
19 9:30 a.m., in Courtroom 5 – 17th Floor, with the joint case management conference
20 statement due on September 21, 2017;

21 (2) hiQ’s deadline to file its opposition to LinkedIn’s motion to dismiss or amend the
22 complaint shall be extended by two weeks to October 11, 2017. LinkedIn’s reply shall
23 be due no later than October 20, 2017, and the hearing shall be set for November 9,
24 2017.

25 **IT IS SO STIPULATED.**

1 Dated: September 11, 2017

FARELLA BRAUN + MARTEL LLP

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Dated: September 11, 2017

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N.D. Cal. Civil Local Rule 5-1 Attestation

I, Deepak Gupta, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with N.D. Cal. Civil Local Rule 5-1, I hereby attest that Jonathan H. Blavin concurred in the filing of this document.

/s/ Deepak Gupta
Deepak Gupta

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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Date: 9/12/17

The Hon. _____

