Foresee Results, Inc. et al v. Auryc, Inc. et al

Doc 56

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Defendants and Counterclaimants AURYC, INC., JINLIN WANG, FENG SHAO, AND AMOD SETLUR (collectively "Defendants") and Plaintiffs and Counterclaim Defendants FORESEE RESULTS, INC., and ANSWERS CORPORATION (collectively "Plaintiffs," and together with Defendants the "Parties") file this joint stipulation respectfully requesting an Order extending the deadline for Early Neutral Evaluation. WHEREAS, the Parties have agreed to engage in Early Neutral Evaluation; WHEREAS, the Court's Case Management Order of March 8, 2018 provides that "[t]he parties are hereby REFERRED to the court's ADR department for the Early Neutral Evaluation to take place, ideally, within the next 90 days," which requires the parties to engage in Early Neutral Evaluation by June 6, 2018 WHEREAS, the Parties have selected a neutral to conduct the Early Neutral Evaluation, Mr. Michael Barclay, and the Early Neutral Evaluation is presently set for June 5, 2018; WHEREAS, the Parties agree that additional time is required in order to permit the Parties to prepare for and conduct a useful Early Neutral Evaluation, and in particular to permit the Parties to complete the discovery and expert analysis needed for a productive Early Neutral Evaluation; NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their respective attorneys of record, and subject to approval by the Court, as follows: 1. The deadline for Early Neutral Evaluation should and shall be extended by not less than 60 days or more than 90 days, to a date on which the Parties and the neutral are all available, to be established by the neutral. The Parties will notify the Court and the ADR Unit promptly of the new date for the Early Neutral Evaluation 2. The Further Case Management Conference current set for July 12, 2018, shall be continued to a date of the Court's choosing after September 14, 2018. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.

1	Dated: May 11, 2018	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2		By /s/ James M. Chadwick
3		JAMES M. CHADWICK
		JESSE A. SALEN Attorneys for Defendants and Counterclaimants
4		AURYC, INC., JINLIN WANG, FENG SHAO,
5		and AMOD SETLUR
6		
7	Dated: May 11, 2018	Respectfully submitted,
8		HOWARD & HOWARD ATTORNEYS PLLC
9		
10		By/s/ Andrew M. Grove PATRICK M. MCCARTHY
11		ANDREW M. GROVE
11		RYAN A. ELLIS
12		Attorneys for Plaintiffs and Counterclaim
13		Defendants FORESEE RESULTS, INC. and ANSWERS CORPORATION
14		
	ATTORNEYS' E-FILING ATTESTATION	
15	As the attorney e-filing this document, and pursuant to Local Rule 5-1(i)(3), I hereby attest	
16		
17	that counsel for Plaintiffs and Counterclaim Defendants FORESEE RESULTS, INC. and	
18		whose electronic signature appears above, have concurred in this
19	filing.	
20	Dated: May 11, 2018	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
21		By/s/James M. Chadwick
22		JAMES M. CHADWICK JESSE A. SALEN
23		Attorneys for Defendants and Counterclaimants
23		AURYC, INC., JINLIN WANG, FENG SHAO, and AMOD SETLUR
24		and ANIOD SETECK
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		Civil Action No. 2:17 CV 00072 BS
	SMRH:486299657.2 STIPU	-2- Civil Action No. 3:17-CV-06973-RS JLATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR ENE

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2	The Court
3	therefor, it is orde
4	in accordance wit
5	set for July 12, 20
6	17th Floor, Unite
7	parties shall file a
8	Dated: <u>5/11/18</u>
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ORDER

t, having considered the stipulation of the Parties, and good cause appearing ered that the deadline for Early Neutral Evaluation should and shall be extended th the Parties' stipulation. The Further Case Management Conference currently 018, shall be continued to September 20, 2018 at 10:00 a.m. in Courtroom 3, d States Courthouse, 450 Golden Gate Avenue, San Francisco, California. The Joint Case Management Statement at least one week prior to the Conference.

The Honorable Richard Seeporg United States District Judge

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