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21 *Green Creative, LLC*

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN FRANCISCO

25 ARGO IMPORT EXPERT, LTD.,
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27 Plaintiff,
28
v.
GREEN CREATIVE, LLC,
Defendant.

Case No. 3:20-cv-04882 - RS

**JOINT STIPULATION AND ORDER
CONTINUING DEADLINE TO
RESPOND TO COMPLAINT AND
RE-SETTING INITIAL CASE
MANAGEMENT CONFERENCE
AS MODIFIED BY THE COURT**

1 Plaintiff Argo Import Export, Ltd. (“Argo”) and defendant Green Creative, LLC, (“Green
2 Creative”) hereby seek entry of the following Stipulation and Proposed Order concerning a 30-
3 day continuation of Green Creative’s deadline for responding and a corresponding continuance of
4 the initial case management conference.¹ In support of their Stipulation and Proposed Order, the
5 parties state as follows:

6 On July 21, 2020, Argo filed the Complaint in the instant action alleging various Green
7 Creative tubed LED products infringe U.S. Pat. No. 10,677,397. ECF 1 (Complaint). On the
8 same day, the Court generated an Order setting forth various early case management deadlines.
9 ECF 7 (Initial Scheduling Order); *see also* ECF 12 (rescheduling). On October 7, 2020, Argo
10 served the Complaint on Green Creative. ECF 17 (Return of Service).

11 Under the current schedule, the parties must file their Rule 26(f) report on October 15,
12 2020, ECF 12, yet Green Creative’s response to the complaint is not due until October 28, 2020.
13 ECF 17. Further, lead counsel for Green Creative has a two-week trial in D.Mass. beginning on
14 November 2, 2020. The parties therefore agree that a 30-day extension of the response to the
15 complaint date to November 27, 2020 would be appropriate. The parties further agree that their
16 Rule 26(f) Report should be due on or after Dec. 10, 2020 and the Court’s initial case management
17 conference moved to December 17, 2020 at 10:00 am. All parties shall appear telephonically and
18 must contact Court Conference at (866) 582-6878 at least one week prior to the Conference to
19 arrange their participation.

20 Concurrence in this filing has been obtained from the other signatory.

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27 ¹ Green Creative has not yet responded or otherwise responded to the Complaint in this action. Without
28 waiving any defense concerning lack of personal jurisdiction or any other defense, Green Creative makes a
limited appearance for purposes of being heard on the instant Stipulation only.

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Argo Import Export, Ltd.

12 Dated: October 15, 2020

Attorneys for Defendant
Green Creative, LLC

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16 **SO ORDERED.**

17 Dated: 10/15/2020

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By: Hon. Richard Seeborg
United States District Judge

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