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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

ZYNGA GAME NETWORK INC. <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> CHIRAG KENIA, A/K/A DANNY BLING, an individual; and K-VALUEMART INDIA PVT. LTD., an Indian entity,, <p style="text-align: center;">Defendants.</p>
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CASE NO. CV 09-3263 CW (EMC)

STIPULATED REQUEST TO CONTINUE FACT DISCOVERY DEADLINE; and

PROPOSED ORDER

CASE NO. CV 09-3263 CW (EMC)
 STIPULATED REQUEST TO
 CONTINUE FACT DISCOVERY
 DEADLINE AND PROPOSED ORDER

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2 Plaintiff Zynga Game Network Inc. (“Zynga”) and defendants Chirag Kenia and K-
3 Valuemart India Pvt. Ltd. (“Defendants”) (Zynga and Defendants are collectively referred to as the
4 “Parties”) submit this stipulated request to continue the fact discovery deadline in this matter.

5 WHEREAS: The Court held a Case Management Conference in this case on June 1, 2010;
6 and

7 WHEREAS: The Court issued a Case Management Order on June 1, 2010 (the “Order”)
8 which specifies that fact discovery in this case must be completed by September 17, 2010; and

9 WHEREAS: The Order specifies that expert discovery must be completed by November
10 29, 2010; and

11 WHEREAS: Defendants have filed a motion to dismiss the First Amended Complaint for
12 lack of personal jurisdiction (the “Motion”), which is noticed for hearing on September 30, 2010;
13 and

14 WHEREAS: The Parties anticipate that additional discovery may be required before the
15 hearing on the Motion, and following the Court’s ruling on the Motion; and

16 WHEREAS: The Parties agree that the nature and status of this litigation are such that
17 expert and fact discovery can proceed concurrently; and

18 WHEREAS: The Parties anticipate that an extension of the fact discovery deadline from
19 September 17 to November 29 will allow them sufficient time to complete discovery regardless of
20 the Court’s ruling on the Motion; and

21 WHEREAS: An extension of the fact discovery deadline to November 29 will not postpone
22 any of the other dates in the Order; and

23 WHEREAS: The Parties submit this stipulation to this Court rather than to Magistrate Chen
24 because it requests a modification of this Court’s Order.

