

1 DOUGLAS E. LUMISH (Bar No. 183863)
 dlumish@kasowitz.com
 2 JEFFREY G. HOMRIG (Bar No. 215890)
 jhomrig@kasowitz.com
 3 JOSEPH H. LEE (Bar No. 248046)
 jlee@kasowitz.com
 4 L. OKEY ONYEJEKWE JR. (Bar No. 250354)
 oonyejekwe@kasowitz.com
 5 JOSEPH B. SHEAR (Bar No. 262222)
 jshear@kasowitz.com
 6 KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
 333 Twin Dolphin Drive, Suite 200
 7 Redwood Shores, California 94065
 Tel: (650) 453-5170; Fax: (650) 453-5171
 8

MICHAEL EISENBERG (*pro hac vice*)
 9 meisenberg@kasowitz.com
 STEVEN D. CHIN (*pro hac vice*)
 10 schin@kasowitz.com
 STEFAN R. STOYANOV (*pro hac vice*)
 11 sstoyanov@kasowitz.com
 ROBERT P. WATKINS III (*pro hac vice*)
 12 rwatkins@kasowitz.com
 KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
 13 1633 Broadway
 New York, New York 10019
 14 Tel: (212) 506-1700; Fax: (212) 506-1800

15 Attorneys for Plaintiffs/Counterclaim Defendants
 TransPerfect Global, Inc., TransPerfect Translations
 16 International, Inc., and Translations.com, Inc.

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 OAKLAND DIVISION

20 TRANSPERFECT GLOBAL, INC.,
 TRANSPERFECT TRANSLATIONS
 21 INTERNATIONAL, INC., AND
 TRANSLATIONS.COM, INC.,
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23 Plaintiffs/Counterclaim
 defendants,

24 v.

25 MOTIONPOINT CORPORATION,
 26

27 Defendant/Counterclaim
 plaintiff.
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Case No. CV 10-02590 CW (JCS)

**STIPULATION AND ~~PROPOSED~~ ORDER
 RE: CONTINUATION OF STAY OF FACT
 DISCOVERY AND STAY OF EXPERT
 PROCEEDINGS PENDING RESOLUTION
 OF MOTIONPOINT'S OBJECTION TO
 ORDER GRANTING TRANSPERFECT'S
 MOTION FOR DISQUALIFICATION (D.I.
 198)**

Judge: Hon. Claudia Wilken

STIPULATION AND ~~PROPOSED~~ ORDER RE:
 CONTINUATION OF STAY

CASE NO. CV 10-02590 CW (JCS)

STIPULATION

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WHEREAS, The Court has entered an Order Granting TransPerfect’s Motion for Disqualification of Counsel (D.I. 198) that disqualifies McDermott Will & Emery LLP from representing MotionPoint in the above-captioned action;

WHEREAS, MotionPoint intends to lodge an objection to the Order Granting TransPerfect’s Motion for Disqualification of Counsel, and, if necessary, retain replacement counsel (the search for which has already commenced) in a reasonable time frame;

THEREFORE, the parties hereby stipulate and agree to a continuation of the stay of discovery in the above-captioned matter, with said stay including expert proceedings (including expert reports and expert discovery), until the Court has adjudicated MotionPoint’s objections, and, if necessary, until MotionPoint has retained new counsel for this matter. This stipulation is without prejudice to TransPerfect’s ability to raise with the Court any issues regarding any delay in MotionPoint’s acquisition of new counsel.

SO STIPULATED.

1 Dated: June 25, 2012

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By: /s/ L. Okey Onyejekwe Jr.
L. Okey Onyejekwe, Jr.
Kasowitz, Benson, Torres & Friedman LLP
Attorneys for Plaintiffs/Counterclaim
Defendants TransPerfect Global, Inc.,
TransPerfect Translations International,
Inc., and Translations.com, Inc.

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By: /s/ Adrian J. Sawyer
Adrian J. Sawyer
Kerr & Wagstaffe LLP
Appearing on a limited basis for
Defendant/Counterclaim Plaintiff
MotionPoint Corporation¹

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I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing
of this document has been obtained from the other signatories.

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/s/L. Okey Onyejekwe, Jr.
L. Okey Onyejekwe, Jr.

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¹ In light of the Order Granting TransPerfect's Motion for Disqualification of Counsel, Kerr & Wagstaffe LLP has been authorized by MotionPoint Corporation to sign this Stipulation and [Proposed] Order. Kerr & Wagstaffe LLP is not appearing as counsel for MotionPoint in this matter.


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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 6/26/2012



HON. CLAUDIA WILKEN
UNITED STATES DISTRICT COURT JUDGE