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A limited liability partnership formed in the State of Delaware

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12 Attorneys for Defendant
TechWorld Corporation, Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 NEILMED PRODUCTS, INC. dba NEILMED
16 PHARMACEUTICALS, INC., a California
corporation,

17 Plaintiff,

18 vs.

19 TECHWORLD CORPORATION, INC., a
20 Nevada corporation, and DOES 1-10 inclusive,

21 Defendants.

22 And Related Counterclaims
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Case No.: 4:10-cv-04330-PJH

**STIPULATION AND [PROPOSED]
ORDER RESCHEDULING BRIEFING
AND HEARING DATES FOR PLAINTIFF
NEILMED PRODUCTS, INC.'S MOTION
FOR LEAVE TO FILE FIRST AMENDED
COMPLAINT**

1 WHEREAS on July 21, 2010, Plaintiff and Counter-Defendant NEILMED PRODUCTS,
2 INC. filed a Motion For Leave To File First Amended Complaint and related pleadings (“Plaintiff’s
3 motion”)(Docket Nos. 42-45);

4 WHEREAS on July 22, 2011, the Court set the following deadlines for the briefing and
5 hearing of Plaintiff’s motion: Responses due by August 4, 2011, Replies due by August 11, 2011
6 and Hearing set for September 14, 2011 at 9:00 AM before the Hon. Phyllis J. Hamilton;

7 WHEREAS on July 28, 2011 Roland Tellis, Esq. of Baron and Budd, P.C. filed a substitution
8 of counsel for Plaintiff and Counter-Defendant NEILMED PRODUCTS, INC, and entered an
9 appearance on August 1, 2011;

10 WHEREAS the parties have conferred through counsel and believe that in their collective
11 best interests and the interests of judicial economy, the currently scheduled dates related to
12 Plaintiff’s motion should be rescheduled to allow new counsel to familiarize himself with the issues
13 set forth in the pending motions and for further consideration of related issues by counsel;

14 THEREFORE, the parties, by and through their undersigned counsel of record, hereby agree
15 and stipulate to the following:

- 16 1. Any Response in Opposition to Plaintiff’s motion will be due by August 15, 2011;
- 17 2. Any Reply in support of Plaintiff’s motion will be due by August 26, 2011;
- 18 3. The Hearing, currently scheduled for September 14, 2011, shall remain on calendar as
19 originally scheduled, or reset for another date that is convenient for the Court.

20
21 DATED: August 1, 2011

REED SMITH LLP

22 By: /s/ Cynthia Kernick

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1 DATED: August 1, 2011

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11 DATED: August 1, 2011

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21 Attorney for Plaintiff & Counter-Defendant
22 Neilmed Products, Inc

23 **[PROPOSED] ORDER**

24 Based on the above stipulation of the Parties and good cause appearing therefor,

25 IT IS SO ORDERED.

26 Dated: August 3, 2011

27 Hon. Phyllis J. Hamilton
28 United States District Court

