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 10 Attorneys for Plaintiff  
 FACEBOOK, INC.

11 **UNITED STATES DISTRICT COURT**  
 12 **NORTHERN DISTRICT OF CALIFORNIA**  
 13 **OAKLAND DIVISION**

14 FACEBOOK, INC., a Delaware corporation,

Case No. 4:11-cv-03619-PJH

15  
 16 Plaintiff,

**STIPULATION AND [~~PROPOSED~~]  
 ORDER CONTINUING CASE  
 MANAGEMENT CONFERENCE  
 AND RELATED DATES**

17 v.

18 CYBER2MEDIA, INC., et al.,

19 Defendants.  
 20

1 WHEREAS, on July 22, 2011, Facebook, Inc. (“Facebook”) filed its original complaint  
2 (“Complaint”) against Defendants Cyber2Media, Inc., Daniel Negari, and several other  
3 Defendants for various causes of action arising from the registration and use of typosquatter  
4 domain names that targeted Facebook’s trademarks and directed users to websites that Facebook  
5 alleges also violated its rights. Dkt. 1;

6 WHEREAS, Facebook filed its First Amended Complaint (“FAC”) on December 12,  
7 2011, which added several new Defendants and allegations discovered as a result of further  
8 investigation. Dkt. 36;

9 WHEREAS, Facebook represents that despite its diligent efforts, it has not yet been able  
10 to locate and serve many Defendants;

11 WHEREAS, Facebook intends to file a Motion for Alternate Service to serve those  
12 Defendants by email within the next 10 days;

13 WHEREAS, the parties have not previously sought a continuance of the Initial Case  
14 Management Conference, but the date has been continued once by the Court;

15 WHEREAS, the Initial Case Management Conference is currently scheduled for January  
16 5, 2012. Dkt. 16; and

17 WHEREAS, for the convenience of the Court and in the interest of efficiency, the parties  
18 have stipulated to continue the Initial Case Management Conference currently scheduled for  
19 January 5, 2012 to allow time for the Court to consider Facebook’s Motion for Alternate Service,  
20 for Facebook to serve the remaining Defendants, and for the parties to continue efforts at early  
21 resolution of this case.

22 Now therefore, the parties, through the undersigned counsel, hereby stipulate and agree as  
23 follows:

24 (1) The Initial Case Management Conference previously scheduled for January 5, 2012  
25 will be continued for 90 days and rescheduled to [April 5, 2012], ~~or on \_\_\_\_\_~~.

26 (2) The Joint Case Management Statement is due seven calendar days before the Initial  
27 Case Management Conference.

1 (3) The parties will hold their Federal Rule of Civil Procedure (“Rule”) 26(f) Conference  
2 on or before January 5, 2011.

3 (4) The parties will file their Rule 26(f) Report and serve their initial disclosures fourteen  
4 calendar days after their Rule 26(f) Conference.

5 **IT IS SO STIPULATED.**

6  
7 DATED: December 27, 2011

**PERKINS COIE LLP**

8  
9 By: /s/ Brian Hennessy  
10 Brian Hennessy (SBN 226721)  
11 BHennessy@perkinscoie.com

12 Attorneys for Plaintiff  
13 Facebook, Inc.

14 DATED: December 27, 2011

**NEWMAN DU WORS LLP**

15 By: /s/ Derek Newman  
16 Derek A. Newman, Bar No. 190467  
17 derek@newmanlaw.com

18 Attorneys for defendants Daniel Negari and  
19 Cyber2Media, Inc.

20 DATED: December 27, 2011

**MICHAEL SUGGS AKA TIMOTHY  
SUGGS**

21 By: /s/ Michael Suggs  
22 *Pro se* litigant

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DATED: December 27, 2011

**ERIC JORDAN**

By: /s/ Eric Jordan  
*Pro se* litigant

DATED: December 27, 2011

**KRONENBERGER ROSENFELD, LLP**

By: /s/ Virginia Sanderson  
Virginia Sanderson, Bar No. 240241  
Ginny@KRInternetLaw.com

Attorneys for defendant Stanley L. Pace

I, Brian Hennessy, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 27, 2011

**PERKINS COIE LLP**

By: /s/ Brian Hennessy  
Brian Hennessy (SBN 226721)  
BHennessy@perkinscoie.com

Attorneys for Plaintiff  
Facebook, Inc.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 1/3/12

Honorable Phyllis J. Hamilton

