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7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11
12 PQ LABS, INC.,

13 Plaintiff,

14 v.

15 YANG QI, ZAAGTECH INC., JINPENG LI,
and HAIPENG LI,

16 Defendants.

Case No.: 12-CV-00450-CW

**STIPULATED REQUEST AND ORDER TO
EXTEND DEADLINE TO CONDUCT
MEDIATION**

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18
19 **STIPULATED REQUEST TO EXTEND DEADLINE TO CONDUCT MEDIATION**

20 Pursuant to ADR LR 6-5, Plaintiff PQ Labs, Inc. (“Plaintiff” and “PQ Labs”) and Defendants
21 Yang Qi, Zaagtech Inc. (“Zaagtech”), Jinpeng Li, and Haipeng Li (“Defendants”), by and through
22 their respective counsel, hereby stipulate and request that the deadline to conduct mediation be
23 extended to December 31, 2013.

24 On October 14, 2013, the parties submitted a joint request to be excused from physical
25 attendance at mediation to the ADR Magistrate Judge, Hon. Maria-Elena James pursuant to ADR LR
26 6-10(d). The parties based their request on, among other things, the fact that the individual
27 Defendants Yang Qi and Jinpeng Li, and the company representative of Defendant Zaagtech and the
28 company representative of Plaintiff PQ Labs all reside in China and personal attendance at mediation

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Stipulated Request to Extend Mediation Deadline

1 in the Bay Area would impose a substantial hardship in terms of time and expense of travel. The
2 parties' joint request was denied on October 22, 2013. As Yang Qi, Jinpeng Li, the company
3 representative of Zaagtech, and the company representative of PQ Labs are presently located in China
4 and cannot make travel arrangements from China to the Bay Area on extremely short notice to satisfy
5 the pending mediation deadline, the parties are not available and not able to conduct a mediation
6 before the October 31, 2013 deadline. Further extension of the mediation deadline was recommended
7 by the ADR Magistrate Judge, Hon. Maria-Elena James in the order denying the parties' request to be
8 excused from physical attendance.

9 Plaintiff and Defendants concur in this Request. The appointed mediator Michael Sobel has
10 been informed of the parties' intention to seek extension of the mediation deadline and is being
11 served with a copy of this Request. A copy of this Request is also being served to the ADR Unit.

12 Based on the foregoing, the parties respectfully request that the Court extend the deadline to
13 conduct mediation to December 31, 2013.

14 *Pursuant to Civil LR 5-1(i)(3), the filer hereby attests that concurrence in the filing of this document*
15 *has been obtained from each signatory below as indicated by "/s/".*

16 Dated: October 25, 2013

Dated: October 25, 2013

17 By: /s/ Otto O. Lee
18 Otto O. Lee
19 Kevin Viau
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Attorneys for Plaintiff PQ Labs, Inc.

Attorney for Defendants Yang Qi, Zaagtech
Inc., Jinpeng Li, and Haipeng Li

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

26 Dated: 10/25/2013


27
28 HON. CLAUDIA WILKEN
United States District Judge

CERTIFICATE OF SERVICE

I certify that on October 25, 2013, I electronically filed the foregoing **STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEADLINE TO CONDUCT MEDIATION** using the Court’s CM/ECF system, which will provide service by email to the following parties:

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Attorney for Defendants Yang Qi, Zaagtech Inc., Jinpeng Li, and Haipeng Li

By: /s/ Otto O. Lee
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