

1 Otto O. Lee, Esq., SB#173987  
 Kevin Viau, Esq., SB# 275556  
 2 Intellectual Property Law Group LLP  
 12 South First Street, Twelfth Floor  
 3 San Jose, CA 95113  
 Telephone: (408) 286-8933  
 4 Facsimile: (408) 286-8932

5 Attorneys for Plaintiff PQ Labs, Inc.

6  
 7 **IN THE UNITED STATES DISTRICT COURT**  
 8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

9 PQ LABS, INC.

10 Plaintiff,

11 v.

12 YANG QI, ZAAGTECH, INC.,  
 JINPENG LI, AND HAIPENG LI.

13 Defendants.  
 14

CASE NO. 12-CV-00450-CW

**STIPULATION TO REVISE BRIEFING  
 SCHEDULE FOR SUMMARY  
 JUDGMENT HEARING SET FOR  
 DECEMBER 5, 2013; ORDER**

15  
 16 Pursuant to Local Rule 7-12, Plaintiff PQ Labs, Inc. (“Plaintiff”) and Defendants  
 17 Zaagtech, Inc., Haipeng Li, Jinpeng Li and Yang Qi (collectively “Defendants”) submit the  
 18 following Stipulation and Request slightly altering the briefing schedule for the Summary  
 19 Judgment Motion brought by Defendants set for hearing on December 5, 2013.

20 Whereas: the Court’s initial case management ruling set December 5, 2013 as the last  
 21 date for hearing on a motion for summary judgment;

22 Whereas: Defendants filed their motion for summary judgment at 11:59 p.m. on  
 23 October 30, 2013;

24 Whereas: the docket text indicates Plaintiff’s response is due November 13, 2013 and  
 25 any reply is due by November 20, 2013:

26 Whereas: Defendants’ memorandum of points and authorities is twenty-five (25)  
 27 pages long;

1           Whereas: Plaintiff's counsel is working diligently in preparing the opposition but is  
2 handicapped by the length of the moving papers and the location of the Plaintiff in China.

3           Now therefore, the parties agree as follows:

4           1.       Plaintiff's response to Defendants' motion for summary judgment is due by  
5 November 14, 2013; Defendants' reply is due by November 21, 2013 and the hearing will  
6 remain scheduled for December 5, 2013.

7  
8 *Pursuant to Civil LR 5-1(i)(3), the filer hereby attests that concurrence in the filing of this*  
9 *document has been obtained from each signatory below as indicated by "/s/".*

10  
11 Intellectual Property Law Group LLP

LEXANALYTICA, PC

12  
13 By: /s/ Otto Lee  
14       Otto O. Lee

By: /s/ Perry Narancic  
Perry J. Narancic

15 Counsel for Plaintiff

Counsel for Defendants

16 Dated: November 11, 2013

Dated: November 11, 2013


17  
18 **ORDER**

19           Based upon the stipulation of counsel, the Court hereby orders as follows:

20           The motion for summary judgment shall remain on calendar for December 5, 2013.  
21 Plaintiff's response is due by November 14, 2013 and Defendants' reply is due by  
22 November 21, 2013.

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

24  
25 Dated: 11/13/2013

  
26 HON. CLAUDIA WILKEN  
United States District Judge

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I certify that on November 13, 2013, I electronically filed the foregoing STIPULATION TO REVISE BRIEFING SCHEDULE FOR SUMMARY JUDGMENT HEARING SET FOR DECEMBER 5, 2013; [PROPOSED] ORDER using the CM/ECF system, which will provide notice by email to the following parties:

Perry J. Narancic, Esq.  
LEXANALYTICA, PC  
1730 S El Camino Real, Suite 270  
San Mateo, CA 94402  
[pjn@lexanalytica.com](mailto:pjn@lexanalytica.com)

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

By: /s/ Otto Lee \_\_\_\_\_  
Otto Lee