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17 Attorneys for Plaintiff
 DSS Technology Management, Inc.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA

20 DSS TECHNOLOGY MANAGEMENT,
 INC.,
 21
 22 Plaintiff,
 23 v.
 24 APPLE INC.,
 25 Defendant.

CASE NO. 4:14-cv-05330 HSG

**STIPULATION AND ORDER
 EXTENDING DEADLINE
 PURSUANT TO LOCAL RULE 79-5**

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, non-party Stragent, LLC, plaintiff DSS
2 Technology Management, Inc. (“DSS”), and defendant Apple Inc. (“Apple”) (collectively, the
3 “Parties”), by and through their respective counsel, stipulate and agree as follows:

4 WHEREAS, on October 17, 2019, DSS filed a Notice of Motion and Motion for Partial
5 Summary Judgment (Dkt. 258) and the Declarations of Brian Carpenter (Dkt. 258-2), and Scott
6 Denning, as well as exhibits in support thereof (Dkt. No. 260) (collectively, the “Motion”);

7 WHEREAS DSS’s Motion references or includes information produced by Stragent in
8 response to a subpoena, as well as personal and confidential information in the Denning
9 declaration, some of which was designated and marked as “Confidential – Attorneys’ Eyes Only”
10 by Stragent or other third parties pursuant to the protective order entered in this case;

11 WHEREAS, on October 17, 2019, DSS filed an Administrative Motion to File Document
12 Under Seal (Dkt. No. 261) (the “Sealing Motion”), regarding the confidential information
13 produced by Stragent or included by Denning (the “non-parties”) and filed by DSS in connection
14 with its Motion;

15 WHEREAS, Local Rule 79-5 requires the non-parties to submit a response and
16 declaration to the Court in support of sealing its confidential material within 4 days of the filing
17 of DSS’s Sealing Motion;

18 WHEREAS, the non-parties received notice of DSS’s filing of its confidential information
19 after close of business hours on October 17, 2019, and the deadline for them to file their
20 respective response to the Sealing Motion is currently October 21, 2019, just two business days
21 after having receiving notice of the Sealing Motion;

22 WHEREAS, in order to provide the non-parties with adequate time to evaluate the
23 material filed by Apple and prepare, as necessary, response(s) and declaration(s) in support of
24 sealing, all Parties have conferred and agreed to extend the deadline for Stragent and Denning to
25 file response(s) and declaration(s) to DSS’s Sealing Motion by one week, until October 28, 2019;

26 WHEREAS, the Parties agree that no party will be prejudiced and no other deadlines will
27 be affected by the extension.

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IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:

Subject to the Court’s approval, Stragent and Denning’s deadline to submit response(s) and declaration(s) regarding DSS’s Sealing Motion pursuant to Local Rule 79-5 is extended up to and until October 28, 2019.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: October 21, 2019

/s/ Kenneth P. Kula
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STRAGENT, LLC**

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**ATTORNEYS FOR PLAINTIFF
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**ATTORNEYS FOR DEFENDANT
APPLE INC.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 10/22/2019


Honorable Haywood S. Gilliam, Jr.
United States District Judge