

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

iMTX STRATEGIC, LLC,

Plaintiff,

v.

Vimeo, LLC,

Defendant.

Case No. 4:15-cv-0592

JOINT STIPULATION TO EXTEND
DEADLINES

iMTX STRATEGIC, LLC,

Plaintiff,

v.

Spotify USA Inc.,

Defendant.

Case No. 4:15-cv-0593

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

iMTX STRATEGIC, LLC,
Plaintiff,
v.
Home Box Office, Inc.,
Defendant.

Case No. 4:15-cv-0595

iMTX STRATEGIC, LLC,
Plaintiff,
v.
Hulu, LLC
Defendant.

Case No. 4:15-cv-0596

iMTX STRATEGIC, LLC,
Plaintiff,
v.
Netflix, Inc.,
Defendant.

Case No. 4:15-cv-0597

1 iMTX STRATEGIC, LLC,

2 Plaintiff,

3 v.

4 Verizon Communications Inc.,

5 Defendant.

Case No. 4:15-cv-0598

6
7
8
9 iMTX STRATEGIC, LLC,

10 Plaintiff,

11 v.

12 Vudu Inc.,

13 Defendant.

Case No. 4:15-cv-0599

14
15
16
17 iMTX STRATEGIC, LLC,

18 Plaintiff,

19 v.

20 Rhapsody

21 Defendant.

Case No. 4:15-cv-0594

22
23
24
25
26 The parties to the above-entitled action submit this JOINT STIPULATION
27 TO EXTEND DEADLINES by three weeks for the Case Management Statement,
28 the Case Management Conference and the initial disclosures.

1 WHEREAS, the above-captioned cases involve claims of infringement of
 2 U.S. Patent No. 7,269,854 (the “’854 patent”) brought by Plaintiff iMTX Strategic,
 3 LLC;

4 WHEREAS, the Court issued an “Order Setting Case Management
 5 Conference and Requiring Joint Case Management Statement” on February 27,
 6 2015 (Dkt. No. 38 in case 4:15-cv-592) and a similar order was filed in the related
 7 cases with the same information and dates set forth below;

8 WHEREAS, the Court set the Case Management Conference for May 22,
 9 2015, at 11:00 a.m. local time and set the deadline for filing the Case Management
 10 Statement five (5) court days prior to the conference;

11 WHEREAS, a third party has filed a petition in the USPTO for *inter partes*
 12 review of the ’854 patent;

13 WHEREAS, the parties need additional time to discuss the impact of that
 14 petition on the schedule and issues in these cases;

15 WHEREAS, counsel for the parties are all available to appear at a case
 16 management conference on June 12, 2015; and

17 WHEREAS, the parties seek this extension of time in good faith and not for
 18 purposes of delay.

19 WHEREFORE, the parties stipulate to, and respectfully request the Court
 20 order the dates be reset as set forth in the table below.
 21
 22
 23

Deadline	Current Date	New Deadline
Initial Disclosures	May 15, 2015	June 5, 2015
Case Management Statement due	May 15, 2015	June 5, 2015

1 Case Management
2 Conference

May 22, 2015

June 12, 2015

3
4 Dated: May 15, 2015

Respectfully submitted,

/s/ Maureen V. Abbey

Steven W. Ritcheson, *Pro Hac Vice*

Email: switcheson@hgdllawfirm.com

9800 D Topanga Canyon Boulevard,

#347

Chatsworth, California 91311

Telephone: (818) 882-1030, (205) 327-

9121

Facsimile: (205) 326-3332

Joseph J. Gleason, *Pro Hac Vice*

Email: jgleason@hgdllawfirm.com

3621 Vinings Slope, Suite 4320

Atlanta, Georgia 30339

Telephone: (404) 996-0862,

Facsimile: (205) 547-5506,

Maureen V. Abbey, *Pro Hac Vice*

Email: Maureen@hgdllawfirm.com

220 Saint Paul Street

Westfield, New Jersey 07090

Telephone: (908) 379-8476

Facsimile: (908) 301-9008

23 **Counsel for Plaintiff iMTX Strategic,**
24 **LLC**

25
26 /s/ Stefani E. Shanberg

Stefani E. Shanberg, SBN 206717

Jennifer J. Schmidt, SBN 295597

1 Michael J. Guo, SBN 284917
2 WILSON SONSINI GOODRICH &
3 ROSATI
4 Professional Corporation
5 One Market Plaza
6 Spear Tower, Suite 3300
7 San Francisco, CA 94105
8 (415) 947-2000

9 **Counsel for Defendants Vimeo, LLC,
10 Netflix, Inc., Hulu, LLC, and Spotify
11 USA Inc.**

12 /s/ Steven Lieberman

13 Steven Lieberman (*pro hac vice*)
14 Brian S. Rosenbloom (*pro hac vice*)
15 Derek F. Dahlgren (*pro hac vice*)
16 ROTHWELL, FIGG, ERNST &
17 MANBECK, P.C.
18 607 14th Street, N.W., Suite 800
19 Washington, DC 20005
20 Telephone: (202) 783-6040
21 Facsimile: (202) 783-6031
22 slieberman@rfem.com
23 brosenbloom@rfem.com
24 ddahlgren@rfem.com

25 James M. Hanlon, Jr., Bar No. 214096
26 GLYNN & FINLEY, LLP
27 One Walnut Creek Center
28 100 Pringle Avenue, Suite 500
Walnut Creek, CA 94596
Telephone: (925) 210-2800
Facsimile: (925) 945-1975
jhanlon@glynnfinley.com

**Counsel for Defendant Home Box
Office, Inc.**

/s/ Christopher Schenck

1 Christopher Schenck (*pro hac vice*)
2 cschenck@kilpatricktownsend.com
3 Stephanie M. Martinez (*pro hac vice*)
4 smartinez@kilpatricktownsend.com
5 **KILPATRICK TOWNSEND &
6 STOCKTON LLP**
7 Suite 4400, 1420 Fifth Avenue
8 Seattle, WA 98101
9 Tel: (206) 467-9600
10 Fax: (206) 623-6793

11 James G. Gilliland, Jr.
12 (State Bar No. 107988)
13 jgilliland@kilpatricktownsend.com
14 Mehrnaz Boroumand Smith
15 (State Bar No. 197271)
16 mboroumand@kilpatricktownsend.com
17 **KILPATRICK TOWNSEND &
18 STOCKTON LLP**
19 Eighth Floor, Two Embarcadero Center
20 San Francisco, CA 94111
21 Tel: (415) 576-0200
22 Fax: (415) 576-0300

23 **Counsel for Defendant and Counter-
24 Plaintiff Rhapsody International, Inc.**

25 /s/ J.C. Rozendaal
26 J.C. Rozendaal (*pro hac vice*)
27 Michael E. Joffre (*pro hac vice*)
28 W. Joss Nichols (SBN: 244524)
KELLOGG, HUBER, HANSEN,
TODD, EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
Telephone: (202) 326-7900
Fax: (202) 326-7999

Robert P. Watkins III (SBN: 298571)
KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, CA 94065
Telephone: (650) 453-5410

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

rwatkins@kasowitz.com
**Counsel for Defendant Verizon
Communications Inc.**

/s/ Bijal V. Vakil
Bijal V. Vakil
CA State Bar No.: 192878
Shamita D. Etienne-Cummings
CA State Bar No.: 202090
White & Case LLP
3000 El Camino Real
Five Palo Alto Square 9th Floor
Palo Alto, CA 94306
Telephone: (650) 213-0300
Facsimile: (650) 213-8158

Counsel for Defendant Vudu, Inc.

The above JOINT STIPULATION TO EXTEND DEADLINES is approved.

~~[In addition, the Court makes the further orders stated below.]~~

IT IS SO ORDERED.

Dated: May 20, 2015


UNITED STATES
DISTRICT/MAGISTRATE JUDGE