

1 *[COUNSEL OF RECORD IDENTIFIED IN SIGNATURE BLOCK]*

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3 **IN THE UNITED STATES DISTRICT COURT**

4 **NORTHERN DISTRICT OF CALIFORNIA**

5 **OAKLAND DIVISION**

<p>7 SYNCHRONOSS TECHNOLOGIES, INC.,</p> <p>8 Plaintiff,</p> <p>9 v.</p> <p>10 DROPBOX, INC.,</p> <p>11 Defendant.</p>	<p>Case No. 4:16-cv-00119-HSG-KAW</p> <p>STIPULATED REQUEST FOR ORDER</p> <p>CHANGING TIME AND ORDER</p> <p>[CIVIL LOCAL RULE 6-2]</p> <p>Judge: Hon. Haywood S. Gilliam, Jr.</p>
<p>13 SYNCHRONOSS TECHNOLOGIES, INC.,</p> <p>14 Plaintiff,</p> <p>15 v.</p> <p>16 EGNYTE, INC.</p> <p>17 Defendant.</p>	<p>Case No. 4:16-cv-00120-HSG-KAW</p> <p>STIPULATED REQUEST FOR ORDER</p> <p>CHANGING TIME AND ORDER</p> <p>[CIVIL LOCAL RULE 6-2]</p> <p>Judge: Hon. Haywood S. Gilliam, Jr.</p>

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STIPULATED REQUEST FOR ORDER CHANGING TIME AND ORDER
CASE NO. 4:16-CV-00119-HSG-KAW / CASE NO. 4:16-CV-00120-HSG-KAW

1 **STIPULATED REQUEST FOR ORDER CHANGING TIME**

2 Plaintiff Synchronoss Technologies, Inc., (“Synchronoss”), Defendant Dropbox, Inc.,
3 (“Dropbox”) and Defendant EgnYTE, Inc., (“EgnYTE”), (collectively, the “Parties”) by and through
4 their respective counsel and subject to the Court’s approval, stipulate as follows:

5 **WHEREAS**, on January 9, 2018, the Court issued an Order Setting the Case
6 Schedule that set a May 25, 2018 deadline for the Parties to complete their document
7 productions (ECF 173, *4:16-CV-00120-HSG-KAW* and ECF 104, *4:16-CV-00120-HSG-*
8 *KAW*);

9 **WHEREAS**, the Parties continue to collect and produce documents on a rolling
10 basis, and have Requests for Production of Documents outstanding to address; (See
11 Declaration of Sarah S. Eskandari (“Eskandari Dec.”), ¶ 3.)

12 **WHEREAS**, the Parties met and conferred to discuss the need for the extension
13 from May 21-23, 2018 via electronic mail, and, given these facts, the Parties believe there is
14 good cause to extend the date for the Parties to complete their document productions by two
15 (2) weeks, from May 25, 2018, to and including June 8, 2018; (*Id.*)

16 **WHEREAS**, there have only been three prior time modifications in this case: (1)
17 when the Court granted Synchronoss’ motion for an extension of time to respond to
18 Dropbox’s original February 5, 2016 motion to dismiss (ECF 70, 71); (2) when the Court
19 granted the Parties’ Stipulated Request for an extension of time for Dropbox to file its reply
20 in support of the Motion to Dismiss (ECF 90, 91); and (3) when the Court granted the
21 Parties’ stipulated request for an extension of time to submit their ESI Stipulation and
22 Protective Order (ECF 121, 123); (Eskandari Dec. ¶ 4.) and

23 **WHEREAS**, the Parties’ requested extension will have no impact on the schedule
24 for the cases overall, as the remaining deadlines in the Scheduling Order will be unaffected;
25 the requested two (2) week extension will leave the Parties with more than three (3) months
26 prior to the September 21, 2018 deadline for the close of fact discovery; and the brief
27 extension will not prejudice any Party. (Eskandari Dec. ¶ 5.)
28

1 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY**
2 **AND BETWEEN THE PARTIES THROUGH THEIR RESPECTIVE COUNSEL,**
3 **THAT** subject to the Court's approval: The date for the Parties to complete their document
4 productions is extended by two weeks from May 25, 2018, to and including June 8, 2018.

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7 Dated this 23rd day of May, 2018.

9 /s/ Sarah S. Eskandari
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FILER'S ATTESTATION:

I, Sarah S. Eskandari, am the ECF user whose ID and password are being used to file the above **STIPULATED REQUEST FOR ORDER CHANGING TIME AND [PROPOSED] ORDER [CIVIL LOCAL RULE 6-2]**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each listed counsel above has concurred in this filing.

Dated: May 23, 2018

By /s/ Sarah S. Eskandari
SARAH S. ESKANDARI

1 **ORDER**


2 **THIS MATTER**, came before the Court on Plaintiff Synchronoss Technologies, Inc.,
3 Defendant Dropbox, Inc., and Defendant EgnYTE, Inc., (collectively, the “Parties”) Stipulated
4 Request for Order Changing Time. The Court, having reviewed and considered the submitted
5 papers in this matter and all relevant factual statements therein, hereby **GRANTS** the Parties'
6 Stipulated Request for Order Changing Time as follows:
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8 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:**

9 The date for the Parties to complete their document productions is extended by two
10 weeks from May 25, 2018, to and including June 8, 2018.
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12 **IT IS SO ORDERED.**

13 DATED: May 24, 2018

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15 HONORABLE HAYWOOD S. GILLIAM JR.
16 UNITED STATES DISTRICT JUDGE
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