

[COUNSEL OF RECORD IDENTIFIED IN SIGNATURE BLOCK]

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

<p>SYNCHRONOSS TECHNOLOGIES, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DROPBOX, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 4:16-cv-00119-HSG-KAW</p> <p>STIPULATED REQUEST FOR ORDER TO COMPLETE CURRENTLY NOTICED DEPOSITIONS BEYOND THE CLOSE OF FACT DISCOVERY</p> <p>[CIVIL LOCAL RULE 6-2]</p> <p>Judge: Hon. Haywood S. Gilliam, Jr.</p> <p>Complaint Filed: March 27, 2015 Case Transferred: January 8, 2016</p>
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**STIPULATED REQUEST FOR ORDER TO COMPLETE CURRENTLY NOTICED DEPOSITIONS
BEYOND THE CLOSE OF FACT DISCOVERY AND ORDER**
CASE NO. 4:16-CV-00119-HSG

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

4 **WHEREAS**, on January 9, 2018, the Court issued an Order Setting the Case
5 Schedule that set a deadline for the Parties to complete fact discovery by September 21,
6 2018. (ECF 173, 4:16-CV-0019-HSG-KAW);

7 **WHEREAS**, the Parties have noticed, scheduled and taken a number of party and
8 nonparty depositions in this matter, but have been unable to take all of the noticed
9 depositions before the cutoff date due to witness availabilities and the large number of non-
10 party depositions noticed; (See Declaration of Sarah S. Eskandari (“Eskandari Dec.”), ¶ 3.)

11 **WHEREAS**, from September 18 through 20, 2018, the Parties met and conferred to
12 discuss the need for approaching the court to obtain leave to complete the noticed
13 depositions after the cutoff date as witness availabilities were being offered into October.
14 Given these facts, the Parties believe there is good cause to allow the completion of the
15 currently noticed depositions after the cutoff date and by October 18, 2018, which may
16 include cleanup document production related to the noticed depositions. (*Id.*)

17 **WHEREAS**, there have only been four prior time modifications in this case: (1)
18 when the Court granted Synchronoss’ motion for an extension of time to respond to
19 Dropbox’s original February 5, 2016 motion to dismiss (ECF 70, 71); (2) when the Court
20 granted the Parties’ Stipulated Request for an extension of time for Dropbox to file its reply
21 in support of the Motion to Dismiss (ECF 90, 91); (3) when the Court granted the Parties’
22 stipulated request for an extension of time to submit their ESI Stipulation and Protective
23 Order (ECF 121, 123); (Eskandari Dec. ¶ 4.); and (4) when the Court granted the Parties’
24 Stipulated Request to Change the Deadline for Document Production (ECF 187) (Eskandari
25 Dec. ¶ 4.);

26 **WHEREAS**, the Parties’ requested extension will have no impact on the schedule,
27 as the remaining deadlines in the Scheduling Order will be unaffected. (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 parties may complete their currently noticed
4 depositions by October 18, 2018, and to include any related document production cleanup related
5 thereto. //

6 //

7 Dated this 21st day of September, 2018.

9 /s/ Sarah S. Eskandari
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24 *Attorneys for Defendant*
25 *Dropbox, Inc.*

1 **FILER'S ATTESTATION:**

2 I, Sarah S. Eskandari, am the ECF user whose ID and password are being used to
3 file the above **STIPULATED REQUEST FOR ORDER TO COMPLETE**
4 **CURRENTLY NOTICED DEPOSITIONS BEYOND THE CLOSE OF FACT**
5 **DISCOVERY [CIVIL LOCAL RULE 6-2]**. In compliance with Civil Local Rule 5-
6 1(i)(3), I hereby attest that each listed counsel above has concurred in this filing.

7 Dated: September 21, 2018

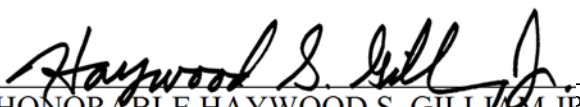
8 By /s/ Sarah S. Eskandari
9 SARAH S. ESKANDARI

10 **ORDER**

11 **THIS MATTER**, came before the Court on Plaintiff Synchronoss Technologies, Inc.
12 and Defendant Dropbox, Inc., (collectively, the "Parties") Stipulated Request for Order
13 allowing completion of currently noticed deposition beyond the fact discovery cutoff. The
14 Court, having reviewed and considered the submitted papers in this matter and all relevant
15 factual statements therein, hereby **GRANTS** the Parties' Stipulated Request for additional time
16 to complete their currently noticed depositions and any associated document production
17 cleanup after the fact discovery cutoff and before October 18, 2018.

18 **IT IS SO ORDERED.**

19 DATED: September 24, 2018

20 
21 HONORABLE HAYWOOD S. GILLIAM JR.
22 UNITED STATES DISTRICT JUDGE