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[COUNSEL OF RECORD IDENTIFIED IN SIGNATURE BLOCK]

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

SYNCHRONOSS TECHNOLOGIES, INC.,	Case No. 4:16-cv-00119-HSG
Plaintiff,	STIPULATED REQUEST FOR ORDER CHANGING TIME AND ORDER
v.	[CIVIL LOCAL RULE 6-2]
DROPBOX, INC.,	Judge: Hon. Haywood S. Gilliam, Jr.
Defendant.	

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 July 3, 2019, Dropbox filed its Motion for Attorney’s Fees (ECF 436)
5 and Bill of Costs (ECF 434); and

6 **WHEREAS**, in light of the July 4 holiday and conflicting deadlines facing counsel
7 for Synchronoss, there is good cause to extend the deadlines for Synchronoss’ Opposition to
8 Dropbox’s Motion for Attorney’s Fees (ECF 436) and Objections to Bill of Costs by two days,
9 from July 17, 2019 to and including July 19, 2019, and to extend the deadlines for Dropbox’s
10 Reply to Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees (Declaration of
11 Sarah S. Eskandari in support of The Parties’ Stipulated Request for Order Changing Time,
12 “Eskandari Decl.,” ¶ 3); and

13 **WHEREAS**, on July 16 and 17, 2019, the Parties met and conferred via e-mail to
14 discuss the need for approaching the Court to request a brief extension of time for the deadline
15 for Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees (ECF 436) and
16 Objections to Bill of Costs (ECF 434) by two days, and to extend the deadline for Dropbox’s
17 Reply to Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees by two business
18 days, to and including July 30, 2019; (Eskandari Decl., ¶ 4); and

19 **WHEREAS**, the Parties respectfully request that the Court extend the deadlines for
20 Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees (ECF 436) and Objections
21 to Bill of Costs (ECF 434) by two days, from July 17, 2019 to and including July 19, 2019,
22 and extend the deadline for Dropbox’s Reply to Synchronoss’ Opposition to Dropbox’s
23 Motion for Attorney’s Fees by two business days, to and including July 30, 2019; and

24 **WHEREAS**, there have been nine prior time modifications in this case: (1) when the
25 Court granted Synchronoss’ motion for an extension of time to respond to Dropbox’s original
26 February 5, 2016 motion to dismiss (ECF 71); (2) when the Court granted the Parties’
27 Stipulated Request for an extension of time for Dropbox to file its reply in support of the
28 Motion to Dismiss (ECF 90); (3) when the Court granted the Parties’ stipulated request for an

1 extension of time to submit their ESI Stipulation and Protective Order (ECF 123); (4) when
2 the Court granted the Parties' Stipulated Request to Change the Deadline for Document
3 Production (ECF 187); (5) when the Court granted the Parties' Stipulated Request to
4 Complete Currently Noticed Depositions Beyond The Close Of Fact Discovery (ECF 224);
5 (6) when the Court granted the Parties' Stipulated Request to extend the deadlines to complete
6 currently noticed fact depositions and to serve expert disclosures and reports (ECF 232);
7 (7) when the Court granted the Parties' Stipulated Request to extend further the deadlines to
8 complete currently noticed fact depositions and to serve expert disclosures and reports (ECF
9 244); and (8) when the Court granted the Parties' Stipulated Request to complete currently
10 noticed expert depositions beyond the close of expert discovery (ECF 291); and (9) when the
11 Court granted the Parties' Stipulated Request to reschedule the hearing date for dispositive
12 and Daubert motions (ECF 342). (Eskandari Decl., ¶ 5.)

13 **WHEREAS**, the Parties' request will have no impact on the case schedule, as the only
14 pending item is the hearing for Dropbox's Motion for Attorney's Fees, which is noticed for
15 November 14, 2019. (Eskandari Decl., ¶ 6.)

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
17 **BETWEEN THE PARTIES THROUGH THEIR RESPECTIVE COUNSEL, THAT**, the
18 Parties respectfully request that the Court: (1) extend the deadlines for Synchronoss'
19 Opposition to Dropbox's Motion for Attorney's Fees (ECF 436) and Objections to Bill of Costs
20 (ECF 434) by two days, from July 17, 2019 to and including July 19, 2019, and (2) extend the
21 deadline for Dropbox's Reply to Synchronoss' Opposition to Dropbox's Motion for Attorney's
22 Fees by two business days, to and including July 30, 2019.

1 Dated this 17th day of July, 2019.
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4 /s/ Sarah S. Eskandari

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Attorneys for Defendant
Dropbox, Inc.

ORDER

THIS MATTER, came before the Court on a Stipulated Request for Order Changing Time by Plaintiff Synchronoss Technologies, Inc. and Defendant Dropbox, Inc., (collectively, the “Parties”). The Court, having reviewed and considered the submitted papers in this matter and all relevant factual statements therein, hereby **GRANTS** the Parties’ Stipulated Request to extend the deadlines for Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees (ECF 436) and Objections to Bill of Costs (ECF 434) by two days, from July 17, 2019 to and including July 19, 2019, and to extend the deadline for Dropbox’s Reply to Synchronoss’ Opposition to Dropbox’s Motion for Attorney’s Fees to and including July 30, 2019.

IT IS SO ORDERED.

DATED: July 18, 2019


HONORABLE HAYWOOD S. GILLIAM JR.
UNITED STATES DISTRICT JUDGE