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11 *Attorneys for Plaintiff*
 12 *SYNCHRONOSS TECHNOLOGIES, INC.*

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 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **OAKLAND DIVISION**

19 SYNCHRONOSS TECHNOLOGIES, INC.,
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 Plaintiff,
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 v.
 22 FUNAMBOL, INC.,
 23
 Defendant.
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Case No.: 4:16-cv-02026-HSG

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND ORDER**

[CIVIL LOCAL RULE 6-2]
 Honorable Haywood S. Gilliam, Jr.

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

4 WHEREAS, on March 15, 2017, the Court issued an Order Setting Schedule that set a
5 March 31, 2017 deadline for the Parties to submit an ESI Stipulation and Protective Order (ECF
6 133).

7 WHEREAS, in light of the fact that, to date, the Parties continue to negotiate the ESI
8 Stipulation and Protective Order, and given the complexity of the case, have not yet come to an
9 agreement on the terms of such a stipulation and Protective Order, there is good cause to extend
10 the date for the Parties to submit their ESI Order and Protective Order by two court days, from
11 March 31, 2017, to and including April 4, 2017.

12 WHEREAS, there have only been three prior time modifications in this case with
13 respect to the Case Management Conference: (1) pending the Court’s decision on the
14 administrative motion to relate the case to Funambol and Egnyte; (2) pending the Court’s
15 decision on Funambol’s Motion to Dismiss in the related matter *Synchronoss v. Dropbox*, Case
16 No. 16-cv-00119-HSG (ECF 52, 57) and; (3) when the Court granted the Parties’ Stipulated
17 Request to continue the date of the Case Management Conference (ECF 78). *See* Civil L.R. 6-
18 2(a)(2).

19 WHEREAS, the Parties’ requested extension will have no impact on the schedule for the
20 case overall, as the remaining deadlines in the Scheduling Order will be unaffected; the
21 requested two day extension will leave the Parties with three (3) weeks prior to the April 24,
22 2017 due date for Synchronoss’ Disclosure of Asserted Claims and Infringement Contentions
23 and accompanying document production, per Patent Local Rules 3-1 and 3-2 and the Order
24 Setting Schedule (ECF 133); and the brief extension will not prejudice any Party.

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3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND
4 BETWEEN THE PARTIES THROUGH THEIR RESPECTIVE COUNSEL, THAT subject to the
5 Court's approval: The date for the Parties to file their ESI Stipulation and Protective Order is
6 extended from March 31, 2017, to and including April 4, 2017.

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8 Dated: March 31, 2017

DENTONS US LLP

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By: /s/ Sarah S. Eskandari

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SARAH S. ESKANDARI

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MARK L. HOGGE

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SHAIENDRA K. MAHESHWARI

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NICHOLAS H. JACKSON

Attorneys for Plaintiff

Synchronoss Technologies, Inc.

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16 Dated: March 31, 2017

DURIE TANGRI LLP

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By: /s/ Timothy C. Saulsbury

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SONALI D. MAITRA

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TIMOTHY C. SAULSBURY

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CATHERINE Y. KIM

Attorneys for Defendant

Funambol, Inc.

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 4, 2017


UNITED STATES DISTRICT JUDGE
HONORABLE HAYWOOD S. GILLIAM, JR.

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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: March 31, 2017

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