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 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.

Case No.: 4:16-cv-02026-HSG

**FURTHER 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) and, on April 4, 2017, extended the deadline to April 4, 2017. (ECF 92.)

7 WHEREAS, in light of the fact that, to date, the Parties have been working diligently to  
8 narrow the issues of dispute with respect to the ESI Stipulation and Protective Order to reduce  
9 the burden upon the Court and continue to negotiate the terms of the ESI Stipulation and  
10 Protective Order, and given the complexity of the case, have not yet come to an agreement on  
11 the terms of such a stipulation and Protective Order, there is good cause to extend the date for  
12 the Parties to submit their ESI Order and Protective Order by three additional court days, from  
13 April 4, 2017, to and including April 7, 2017.

14 WHEREAS, there have only been four prior time modifications in this case with respect  
15 to the Case Management Conference: (1) pending the Court’s decision on the administrative  
16 motion to relate the case to Funambol and Egnyte; (2) pending the Court’s decision on  
17 Funambol’s Motion to Dismiss in the related matter *Synchronoss v. Dropbox*, Case No. 16-cv-  
18 00119-HSG (ECF 52, 57); (3) when the Court granted the Parties’ Stipulated Request to  
19 continue the date of the Case Management Conference (ECF 78); and (4) when the Court  
20 granted the Parties Stipulated Request to extend the deadline to submit their ESI Stipulation and  
21 Protective Order (ECF 92). *See* Civil L.R. 6-2(a)(2).

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

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND  
2 BETWEEN THE PARTIES THROUGH THEIR RESPECTIVE COUNSEL, THAT subject to the  
3 Court's approval: The date for the Parties to file their ESI Stipulation and Protective Order is  
4 extended to and including April 7, 2017.

5  
6 Dated: April 4, 2017

**DENTONS US LLP**

7  
8 By:  /s/ Sarah S. Eskandari

9 SARAH S. ESKANDARI  
10 MARK L. HOGGE  
11 SHAIENDRA K. MAHESHWARI  
12 NICHOLAS H. JACKSON

*Attorneys for Plaintiff  
Synchronoss Technologies, Inc.*

13  
14 Dated: April 4, 2017

**DURIE TANGRI LLP**

15  
16 By:  /s/ Timothy C. Saulsbury

17 SONALI D. MAITRA  
18 TIMOTHY C. SAULSBURY  
19 CATHERINE Y. KIM


*Attorneys for Defendant  
Funambol, Inc.*

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**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: April 6, 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: April 4, 2017

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