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 GEOVECTOR CORPORATION

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

11
 12 **GEOVECTOR CORPORATION**, a California
 corporation,

13 Plaintiff;

14 v.

15 **SAMSUNG INTERNATIONAL, INC.**, a New
 16 Jersey corporation;
SAMSUNG ELECTRONICS CO., LTD., a
 17 Korean corporation;
SAMSUNG ELECTRONICS AMERICA, INC., a
 18 New York corporation;
SAMSUNG TELECOMMUNICATIONS
 19 **AMERICA, LLC**, a Delaware limited liability
 company; and
 20 **SAMSUNG RESEARCH AMERICA, INC.**, a
 21 California corporation.

22 Defendants.

Case No. 4:16-cv-02463-DMR

13 **MODIFIED**
STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING TIME TO RESPOND TO
COMPLAINT

16 Complaint Filed: May 5, 2016

17 Before the Hon. Donna M. Ryu

Computerlaw Group LLP
 www.computerlaw.comsm

1 **STIPULATION TO EXTEND TIME**

2 This Stipulation is entered into by Plaintiff GeoVector Corporation (originally CritiCom
3 Corporation, hereinafter "GeoVector," or "Plaintiff,") and Defendants Samsung Electronics Co.,
4 Ltd. ("SEC"), and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung," or
5 "Defendants") by their respective counsel.¹

6 **RECITALS**

- 7 1. On May 5, 2016, Plaintiff filed an Original Complaint in the instant action.
- 8 2. On May 6, 2016, the Court scheduled the initial case management conference for
9 August 3, 2016.
- 10 3. On May 13, 2016, Plaintiff served SEA with the Summons and Original
11 Complaint.
- 12 4. On June 7, 2016, Plaintiff filed its First Amended Complaint.
- 13 5. Plaintiff agreed to an extension of time for the Defendants to respond to the
14 Complaint by 90 days in exchange for SEC's agreement to accept or otherwise waive service of
15 the Summons and Complaint such that Defendants' response to the First Amended Complaint is
16 due on the same date.
- 17 6. Civil Local Rule 6-1(a) for the United States District Court for the Northern
18 District of California allows the parties to stipulate, without a court order, to extend the time
19 within which to respond to a complaint, provided that the extension will not alter the dates of any
20 events or deadlines already set by the Court; and
- 21 7. Civil Local Rule 6-1(a) requires that any such stipulations be promptly filed with
22 the Court.
- 23
- 24

25 _____
26 ¹ The First Amended Complaint also lists Samsung Telecommunications America, LLC ("STA"),
27 Samsung Research America, Inc. ("SRA"), and Samsung International, Inc. ("SII") as
28 defendants. However, Samsung makes the representation that certain of these parties are
improperly listed and should be removed from this case, including STA which merged into SEA
prior to the filing of the Original Complaint. Accordingly, Samsung reserves the right to move to
dismiss improperly-named parties such as STA at a later date.

1 **STIPULATION**

2 The parties agree that (i) the Case Management Conference should be continued from
3 August 3, 2016 to September 14, 2016, or any other date suitable for the Court that is after the
4 Defendants file their answer, and (ii) the Case Management Statement is due one week prior to
5 the rescheduled Case Management Conference.

6 The parties also agree that the undersigned Mr. Dan Girdwood hereby accepts service on
7 behalf of all named defendants listed in the First Amended Complaint that has been filed by
8 Plaintiff.²

9 The parties also agree that all named defendants may have an extension of time through
10 September 2, 2016 to file a response to the First Amended Complaint.

11 COMPUTERLAW GROUP LLP

12 Dated: June 10, 2016

By: /s/ Christopher Sargent
Jack Russo
Christopher Sargent

13
14 Attorneys for Plaintiff
15 GEOVECTOR CORPORATION

16 SAMSUNG ELECTRONICS AMERICA, INC.

17 Dated: June 10, 2016

By: /s/ Dan Girdwood
Dan Girdwood

18
19 On Behalf of Defendants
20 SAMSUNG ELECTRONICS CO., LTD.,
21 SAMSUNG ELECTRONICS AMERICA, INC.,
22 SAMSUNG INTERNATIONAL, INC. and
SAMSUNG RESEARCH AMERICA, INC.

23 **ATTESTATION OF E-FILED SIGNATURE**

24 I, Christopher Sargent, am the ECF user whose ID and password are being used to file
25 this stipulation. In compliance with Civil L. R. 5-1(i)(3), I hereby attest that Dan Girdwood has
26 concurred in the filing's content and has authorized this filing.

27 /s/ Christopher Sargent

28 ² Mr. Girdwood's acceptance of service is not a representation that any party named in Plaintiff's Original Complaint or First Amended Complaint is a proper party to this dispute.

1 MODIFIED ORDER

2 The case management conference set for August 3, 2016 is now set for September ²¹~~14~~,
3 2016 at 10:00 a.m. in Courtroom 4, 3rd Floor, Oakland before Magistrate Judge Donna M. Ryu
4 and the Case Management Statement is due on September ¹⁴~~7~~, 2016.

5
6 Dated: June 13, 2016

7 Hon. Donna M. Ryu
8 United States Magistrate Judge

