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Attorneys for Plaintiff
 10 PACE Anti-Piracy, Inc.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 OAKLAND DIVISION

14 PACE ANTI-PIRACY, INC. a California
 corporation,

15 Plaintiff,

16 v.

17 INSIDE SECURE, a French legal entity, and
 18 INSIDE SECURE CORP., a Delaware
 corporation,

19 Defendant.

CASE NO. 4:17-cv-05860-HSG

**STIPULATION AND ORDER FOR
 CONTINUANCE OF INITIAL CASE
 MANAGEMENT CONFERENCE AND
 ACCOMPANYING DEADLINES**

1 **STIPULATION**

2 This Stipulation is made pursuant to Local Rule 6-2 by and between Plaintiff PACE Anti-
3 Piracy, Inc. (“PACE”) and Defendants Inside Secure and Inside Secure Corp. (collectively, “IS”)
4 through their respective attorneys. PACE and IS (collectively, the “Parties”) stipulate as follows:

5 1. The Court’s Order Setting Initial Case Management Conference and ADR
6 Deadlines dated October 12, 2017 (“Initial CMC Order”) set an initial case management
7 conference in this case for January 12, 2018 at 2:00 p.m. (“Initial CMC”), and directed counsel to
8 meet and confer regarding their respective Rule 26(f) obligations in advance of the CMC no later
9 than December 22, 2017. (Dkt. No. 7).

10 2. The Court’s Initial CMC Order also stated that, under Rule 26(f), initial disclosures
11 must be made at or within fourteen (14) days after the Rule 26(f) conference, or by January 5, 2018.

12 3. On December 1, 2017, this case was reassigned to the Honorable Haywood S.
13 Gilliam, Jr. (“Order Reassigning Case”). The Order Reassigning Case vacated the Initial CMC, but
14 kept all other deadlines, such as those for ADR compliance, in place. (Dkt. No. 29).

15 4. Also on December 1, 2017, the Initial CMC was re-scheduled for January 16, 2018
16 at 2:00 p.m., with the deadline to meet and confer re-scheduled to December 26, 2017 and the
17 deadline for the filing of the Case Management Conference Statement re-scheduled to January 9,
18 2018. (Dkt. No. 28).

19 5. There have been no previous time modifications in this case except for two
20 extensions of time for IS to respond to PACE’s complaint; that response is due on December 26,
21 2017. (Dkt. Nos. 20 and 31).

22 6. The Parties have engaged in face-to-face settlement discussions and have
23 exchanged proposed settlement terms. While the Parties are still negotiating those terms, the
24 Parties request this continuance of the Case Management Conference Schedule deadlines as set
25 out below so that they can continue settlement negotiations in the hope that this case can be
26 settled prior to the below proposed January 16, 2018 deadline.

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28 ///

1 7. The Parties have agreed to modify the Case Management Conference Schedule as
2 follows:

CASE MANAGEMENT CONFERENCE SCHEDULE		
Date	Event	Governing Rule
January 16, 2018	Last day to meet and confer re: initial disclosures and discovery plan	FRCP 26(f)
January 30, 2018	Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (also available at http://www.cand.uscourts.gov)	FRCP 26(a)(1) Civil L.R. 16-9
February 6, 2018, at 2:00pm	INITIAL CASE MANAGEMENT CONFERENCE (CMC): Oakland Courthouse Courtroom 2 - 4th Floor 1301 Clay Street, Oakland, CA 94612	Civil L.R. 16-10

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

16 Dated: December 20, 2017

HOPKINS & CARLEY, A Law Corporation

18 By: /s/ John Picone

John V. Picone III

Attorney for Plaintiff PACE Anti-Piracy, Inc.

21 Dated: December 20, 2017

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
LLP

23 By: /s/ James Pak

James Y. Pak

Attorney for Defendants Inside Secure and
Inside Secure Corp.

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ATTESTATION OF E-FILED SIGNATURE

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a “conformed” signature (/ s /) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: December 20, 2017


By: /s/ John Picone
John V. Picone III
Attorney for Plaintiff
PACE Anti-Piracy, Inc.

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: DECEMBER 21, 2017

By: 
HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE