	Case 4:18-cv-01044-HSG Document 17	1 Filed 05/03/19 Page 1 of 6
1 2 3 4 5 6 7 8	ALLAN E. ANDERSON (SBN 133672) TRACY LUU-VARNES (SBN 281165) ARENT FOX LLP 555 West Fifth Street, 48th Floor Los Angeles, CA 90013-1065 Telephone: 213.629.7400 Facsimile: 213.629.7401 Email: allan.anderson@arentfox.co tracy.luu-varnes@arentfox.c Attorneys for Non-Parties DANIEL WOODS and MIKE HILBERN UNITED STATES	m com
9	NORTHERN DISTRICT OF CAL	LIFORNIA, OAKLAND DIVISION
10		
11	TECHSHOP, INC. a California	CASE NO. 4:18-CV-01044-HSG
12 13	corporation, DORIS A. KAELIN, in her capacity as Chapter 7 trustee for TECHOP, INC.	STIPULATION TO MODIFY BRIEFING SCHEDULE AND
14	Plaintiff,	HEARING ON NON-PARTY WITNESSES MOTION TO
15	v.	MODIFY DEFENDANTS' SUBPOENA TO LIMIT SCOPE
16	DAN RASURE, an individual residing in Kansas, TECHSHOP 2.0 LLC, a	OF TESTIMONY AT TRIAL, OR IN THE ALTERNATIVE, A MOTION FOR PROTECTIVE
17	Kansas limited liability corporation, TECHSHOP 2.0 SAN FRANCISCO	ORDER AND ORDER
18	LLC, a Kansas limited liability corporation,	[Declaration of Tracy Luu-Varnes in support of filed and lodged concurrently herewith and in support
19 20	Defendants.	concurrently herewith and in support hereof]
20		
21 22		Judge: Hon. Haywood S. Gilliam, Jr.
22	AND RELATED COUNTERCLAIMS	
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27		
28		STIPULATION; PROPOSED ORDER
Fox LLP		CASE NO. 4:18-CV-01044-HSG

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1	Pursuant to Local Rule 6-2, counsel for	the parties and non-party witnesses	
2	Mike Hilberman and Daniel Woods (the "Part	ies") hereby stipulate as follows:	
3	WHEREAS, on April 25, 2019, non-par	rty witnesses Mike Hilberman and	
4	Daniel Woods filed their Motion to Modify De	efendants' Subpoena to Limit Scope	
5	of Testimony at Trial, or in the Alternative, A	Motion for Productive Order (ECF	
6	No. 159) ("Motion"), which, based on the Cou	art's rules, availability and scheduling	
7	notes, is currently set to be heard on August 22	2, 2019;	
8	WHEREAS, trial on this matter is curre	ntly scheduled to begin on June 3,	
9	2019, over three months before the Motion wi	ll be heard;	
10	WHEREAS, the Parties have agreed to	the following revised briefing	
11	schedule and hearing date to allow the Motion	to be heard prior to the	
12	commencement June 3, 2019 trial:		
13			
14	Hearing on Motion Ma	y 23, 2019 at 2:00 p.m., or another	
15	dat	e prior to May 30, 2019 in advance	
16	oft	the June 3, 2019 trial that is	
17	cor	nvenient with the Court	
18	Deadline to file Opposition Ma	y 10, 2019	
19	Deadline to file Reply Ma	y 16, 2019	
20			
21	NOW, THEREFORE, IT IS HEREBY S	STIPULATED by and between the	
22	Parties, through their respective counsel and su	ubject to the Court's approval, that	
23	the hearing on the Motion will take place on N	May 23, 2019 at 2:00 p.m., or another	
24	date prior to May 30, 2019 in advance of the J	une 3, 2019 trial that is convenient	
25	with the Court, and the briefing schedule for the	with the Court, and the briefing schedule for the Motion will be as follows:	
26	- the Opposition, if any, will be filed o	on or before May 10, 2019; and	
27	- the Reply, if any, will be filed on or	before May 16, 2019.	
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Arent Fox LLP ATTORNEYS AT LAW LOS ANGELES

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1	IT IS SO	STIPULATED.	
2	11 15 5 5		Respectfully submitted,
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4			
5	Dated:	May 2, 2019	ARENT FOX LLP
6			
7			By <u>: /s/ Tracy Luu-Varnes</u> ALLAN E. ANDERSON
8			TRACY LUU-VARNES Attorneys for Non-Party Witnesses Daniel Woods and Mike Hilberman
9			Daniel Woods and Mike Hilberman
10			
11	Dated:	May 2, 2019	PARRISH LAW OFFICE
12		, <u>-</u> 0>	
13			By: /s/ James Charles Pistonino
14			By: /s/ James Charles Pistonino James Charles Pistorino Parrish Law Office
15			Attorneys for Plaintiff/Cross-Defendant
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LLP LAW			STIPULATION: PROPOSED ORDER

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1	Dated:	May 2, 2019	
2			By: /s/ Andrea Pallios Roberts
3			Ann McFarland Draper courts@draperlaw.net
4			Draper Law Offices 75 Broadway, Suite 202
5			San Francisco, Ca 94111 Telephone: (415) 989-5620
6			
7			QUINN EMANUEL URQUHART & SULLIVAN, LLP Kevin P.B. Johnson
8			kevinjohnson@quinnemanuel.com Andrea Pallios Roberts
9			andreaproberts@quinnemanuel.com 555 Twin Dolphin Drive, 5 th Floor
10			Redwood Shores, CA 94065 Telephone: (650) 801-5000
11			Ed Franco
12			eddfranco@quinnemanuel.com 51 Madison Avenue, 22 nd Floor
13			New York, NY 10010 Telephone: (212) 849-7000
14			John E. Nathan (Pro Hac Vice)
15			jnathan155@yahoo.com John E. Nathan LLC
16			New York, NY 10128 Telephone: (917) 960-1667
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18			Attorneys for Defendants and Counterclaimants
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1 DECLARATION PURSUANT TO LOCAL RULE 5-1 2 I, Tracy Luu-Varnes, hereby declare pursuant to Civil Local Rules 5 3 have obtained the concurrence in the filing of this document has been obtae 4 each of the above signatories. 5 Executed this 2nd day of May, 2019, in Los Angeles, California. 6 By: /s/ Tracy Luu-Varnes 9 TRACY LUU-VARNES 10 Interpret the state of the state	
2 I, Tracy Luu-Varnes, hereby declare pursuant to Civil Local Rules 2 3 have obtained the concurrence in the filing of this document has been obtate each of the above signatories. 5 Executed this 2nd day of May, 2019, in Los Angeles, California. 6 7 7 By: /s/ Tracy Luu-Varnes 9 TRACY LUU-VARNES 10 TRACY LUU-VARNES 11 12 13 14 15 16 16 17 18 19	
 have obtained the concurrence in the filing of this document has been obtained the concurrence in the filing of this document has been obtained the above signatories. Executed this 2nd day of May, 2019, in Los Angeles, California. By: /s/ Tracy Luu-Varnes By: /s/ Tracy Luu-Varnes TRACY LUU-VARNES 	
4each of the above signatories.5Executed this 2nd day of May, 2019, in Los Angeles, California.6	ined from
Executed this 2nd day of May, 2019, in Los Angeles, California. By: /s/ Tracy Luu-Varnes By: /s/ Tracy Luu-Varnes TRACY LUU-VARNES 10 11 12 13 14 15 16 17 18 19	
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7 8 9 10 11 12 13 14 15 16 17 18 19	
8 By: /s/ Tracy Luu-Varnes 9 TRACY LUU-VARNES 10 11 12 13 14 15 16 17 18 19	
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1	ORDER
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3	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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5	
6	Dated: May 3, 2019 Haywood S. Jull J.
7	JUDGE HON. HAYWOOD S. GILLIAM, JR.
8	JUDGE HON. HAYWOOD S. GILLIAM, JR. United States District Court Northern District of California
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ARENT FOX LLP Attorneys At Law Los Angeles	- 6 - STIPULATION; PROPOSED ORDER