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6 Attorneys for Non-Parties
 7 DANIEL WOODS and MIKE HILBERMAN

8 UNITED STATES DISTRICT COURT
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 10 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

11 TECHSHOP, INC. a California
 12 corporation, DORIS A. KAELIN, in
 13 her capacity as Chapter 7 trustee for
 TECHOP, INC.

14 Plaintiff,

15 v.

16 DAN RASURE, an individual residing
 in Kansas, TECHSHOP 2.0 LLC, a
 17 Kansas limited liability corporation,
 TECHSHOP 2.0 SAN FRANCISCO
 18 LLC, a Kansas limited liability
 corporation,

19 Defendants.

CASE NO. 4:18-CV-01044-HSG

**STIPULATION TO MODIFY
 BRIEFING SCHEDULE AND
 HEARING ON NON-PARTY
 WITNESSES MOTION TO
 MODIFY DEFENDANTS'
 SUBPOENA TO LIMIT SCOPE
 OF TESTIMONY AT TRIAL, OR
 IN THE ALTERNATIVE, A
 MOTION FOR PROTECTIVE
 ORDER AND ORDER**

[Declaration of Tracy Luu-Varnes in support of filed and lodged concurrently herewith and in support hereof]

Judge: Hon. Haywood S. Gilliam, Jr.

22 AND RELATED COUNTERCLAIMS

28 STIPULATION; ~~PROPOSED~~ ORDER
 CASE NO. 4:18-CV-01044-HSG

1 Pursuant to Local Rule 6-2, counsel for the parties and non-party witnesses
2 Mike Hilberman and Daniel Woods (the “Parties”) hereby stipulate as follows:

3 WHEREAS, on April 25, 2019, non-party witnesses Mike Hilberman and
4 Daniel Woods filed their Motion to Modify Defendants’ 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 Court’s rules, availability and scheduling
7 notes, is currently set to be heard on August 22, 2019;

8 WHEREAS, trial on this matter is currently scheduled to begin on June 3,
9 2019, over three months before the Motion will 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:

Hearing on Motion	May 23, 2019 at 2:00 p.m., or another date prior to May 30, 2019 in advance of the June 3, 2019 trial that is convenient with the Court
Deadline to file Opposition	May 10, 2019
Deadline to file Reply	May 16, 2019

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the
22 Parties, through their respective counsel and subject to the Court’s approval, that
23 the hearing on the Motion will take place on May 23, 2019 at 2:00 p.m., or another
24 date prior to May 30, 2019 in advance of the June 3, 2019 trial that is convenient
25 with the Court, and the briefing schedule for the Motion will be as follows:

- 26 - the Opposition, if any, will be filed on or before May 10, 2019; and
- 27 - the Reply, if any, will be filed on or before May 16, 2019.

1 IT IS SO STIPULATED.

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Respectfully submitted,

Dated: May 2, 2019

ARENT FOX LLP

By: /s/ Tracy Luu-Varnes
ALLAN E. ANDERSON
TRACY LUU-VARNES
Attorneys for Non-Party Witnesses
Daniel Woods and Mike Hilberman

Dated: May 2, 2019

PARRISH LAW OFFICE

By: /s/ James Charles Pistorino
James Charles Pistorino
Parrish Law Office
Attorneys for Plaintiff/Cross-Defendant

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Dated: May 2, 2019

By: /s/ Andrea Pallios Roberts

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Attorneys for Defendants and
Counterclaimants

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DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Tracy Luu-Varnes, hereby declare pursuant to Civil Local Rules 5-1(i)(3), I have obtained the concurrence in the filing of this document has been obtained from each of the above signatories.

Executed this 2nd day of May, 2019, in Los Angeles, California.


By: /s/ Tracy Luu-Varnes
TRACY LUU-VARNES

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 3, 2019


JUDGE HON. HAYWOOD S. GILLIAM, JR.
United States District Court
Northern District of California