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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

13 M.A. MOBILE LTD., a limited liability
 company chartered in Dominica; and
 14 MANDANA D. FARHANG,

15 Plaintiff,

16 v.

17 INDIAN INSTITUTE OF TECHNOLOGY
 KHARAGPUR, an Indian Institute of
 18 Technology incorporated under the "Institutes
 of Technology Act, 1961"; TECHNOLOGY
 19 ENTREPRENEURSHIP AND TRAINING
 SOCIETY, an Indian society; PARTHA P.
 20 CHAKRABARTI; RAKESH GUPTA;
 PRAVANJAN CHOUDHRY; and DOES 1
 21 through 100, inclusive,

22 Defendant.

Case No. C-08-02658-RMW (HRL)

**STIPULATION AND []
 ORDER EXTENDING BRIEFING
 SCHEDULE ON MOTION FOR NON
 DISQUALIFICATION OF ORRICK,
 HERRINGTON & SUTCLIFFE LLP**

Date: September 30, 2011
 Time: 9:00 am
 Judge: Honorable Ronald M. Whyte

1 WHEREAS, on August 24, 2011, Orrick, Herrington & Sutcliffe (“Orrick”) brought a
2 Motion for Order Determining Nondisqualification in the event it were to hire potential lateral
3 associate Jeffrey McKenna to work in its e-discovery group;

4 WHEREAS, on September 7, 2011, Plaintiffs opposed that Motion, but indicated, among
5 other things, that they would not seek to disqualify Orrick based upon Mr. McKenna’s
6 employment provided that Orrick agrees to maintain an appropriate ethical wall (the terms of
7 which are proposed to be filed with and approved by the Court pursuant to an appropriate
8 stipulation) and provided that no further information is revealed to Plaintiffs which would
9 otherwise require disqualification;

10 WHEREAS, the deadline for Orrick’s Reply in support of the Motion for Order
11 Determining Nondisqualification (“Reply”) is currently September 14, 2011;

12 WHEREAS, the parties are currently engaged in discussions regarding the potential
13 ethical wall and related issues and may be able to stipulate to a proposed ethical wall;

14 WHEREAS, to provide sufficient time for the parties to attempt to resolve this issue
15 informally, Orrick has requested that the deadline for the Reply be extended until September 21,
16 2011 and Plaintiffs are willing to grant said extension;

17 WHEREAS, the September 30, 2011 hearing and all other deadlines shall remain in place
18 and the proposed revised briefing schedule shall apply only to Orrick’s reply to the above
19 referenced motion and will not materially delay the disposition of the case before the Court;

20 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
21 undersigned counsel, subject to approval of the Court, that:

- 22 1. Orrick’s Reply will be due on or before September 21, 2011.
- 23 2. The September 30, 2011 hearing and all other deadlines shall remain in place.

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Dated: September 14, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ James E. Thompson
James E. Thompson
Attorneys for Defendants' Counsel
Orrick, Herrington & Sutcliffe LLP

Dated: September 14, 2011

SANJIV N. SINGH, A PROFESSIONAL LAW CORPORATION

By: /s/ Sanjiv N. Singh
Sanjiv N. Singh
Attorneys for Plaintiffs
MANDANA D. FARHANG
AND M.A. MOBILE LTD.

IT IS SO ORDERED.

DATED: _____



HONORABLE RONALD M. WHITE
United States District Judge