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17 Attorneys for Plaintiffs TechCrunch, Inc., et al.

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA  
 20 SAN FRANCISCO DIVISION

21 TECHCRUNCH, INC. a Delaware  
 corporation, and CRUNCHPAD, INC., a  
 Delaware corporation,

22 Plaintiffs,

23 vs.

24 FUSION GARAGE PTE. LTD, a Singapore  
 25 company,

26 Defendant.

CASE NO. 09-cv-5812 RS (PVT)

**STIPULATION AND [PROPOSED]  
 ORDER GRANTING EXTENSION OF  
 TIME REGARDING FUSION GARAGE'S  
 PRODUCTION OF REDACTED SOURCE  
 CODE**

1           WHEREAS, on October 6, 2010, the Court ordered Fusion Garage to produce several  
2 categories of documents including source code documents. (Dkt. 184) (hereinafter “Order”). The  
3 Court allowed Fusion Garage to redact the actual JooJoo source code while leaving the source  
4 code comments and metadata;

5           WHEREAS, the Court’s Order established a deadline of October 22, 2010 for this  
6 production;

7           WHEREAS, the responsive source code documents comprise 10,325 discrete documents  
8 and 76,289 individual pages, virtually all of which require manual redactions for each page;

9           WHEREAS, Fusion Garage has been diligently redacting and processing these documents  
10 for production, but will require roughly two weeks from the present date to finish this process,  
11 given the volume of source code documents and the number of manual redactions at issue;

12           WHEREAS, Fusion Garage has prepared the other non-source code documents called for  
13 by the Order for production and will produce these documents by October 22, 2010, and will also  
14 respond to Plaintiffs’ Interrogatory Nos. 1 and 2 by October 22, 2010;

15           WHEREAS, counsel for the parties have meet and conferred concerning Fusion Garage’s  
16 source code redactions and the need for additional time to comply with the Court’s Order;

17           WHEREAS, the following time modifications have been previously made in this case:  
18 time to file a responsive pleading (Dkt. No. 16); motion to set the hearing dates on Fusion  
19 Garage’s motion to dismiss, to strike, and for a more definite statement (“motion to dismiss”) and  
20 Plaintiffs’ motion for a preliminary injunction to May, 6, 2010 (Dkt. No. 45); motion to shorten  
21 time to hear Fusion Garage’s motion to compel documents to support its opposition to Plaintiffs’  
22 Motion for a preliminary injunction (Dkt. No. 55); setting new hearing date on Plaintiffs’ motion  
23 for a preliminary injunction and defendant’s motion to dismiss (Dkt. 64); and granting extension  
24 of time regarding briefing on Plaintiffs’ motion to compel (Dkt. 178);

25           NOW, THEREFORE, the parties stipulate and agree that Fusion Garage shall have a two-  
26 week extension, until November 5, 2010, to produce its redacted source code documents to  
27 Plaintiffs. The October 22, 2010 date for Fusion Garage to produce its non-source code  
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1 documents and respond to Plaintiffs' Interrogatory Nos. 1 and 2 set forth in the Court's October 6,  
2 2010 Order shall remain unchanged.

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IT IS SO STIPULATED.

Dated: October 20, 2010

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Thomas R. Watson  
Thomas R. Watson

Attorneys for Defendant Fusion Garage PTE., Ltd.

DATED: October 20, 2010

WINSTON & STRAWN LLP

By /s/ Matthew A. Scherb  
Matthew A. Scherb

Attorneys for Plaintiffs TechCrunch, Inc. and  
CrunchPad, Inc.

Pursuant to stipulation, it is SO ORDERED.

DATED: October \_\_\_\_, 2010

HON. PATRICIA V. TRUMBULL  
UNITED STATES MAGISTRATE JUDGE

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**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest that I have obtained concurrence in the filing of this document from Matthew A. Scherb, counsel for Plaintiffs.

DATED: October 20, 2010

By: /s/ Thomas R. Watson  
Thomas R. Watson