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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 TECHCRUNCH, INC., et al.

18 Plaintiffs,

19 vs.

20 FUSION GARAGE PTE. LTD.,

21 Defendant.
22

) **Case No. 3:09-cv-05812 RS (PSG)**

) **JOINT STIPULATION AND [PROPOSED]**
) **ORDER SETTING HEARING DATE ON**
) **FUSION GARAGE'S MOTION TO**
) **COMPEL**

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Pursuant to the Magistrate Judge Paul S. Grewal’s December 2010 Standing Order, the parties stipulate as follows:

WHEREAS, Defendant Fusion Garage PTE Ltd. (“Fusion Garage”) filed a Motion to Compel on September 9, 2011, which was scheduled to be heard on October 18, 2011 (“Motion”) (Dkt. 212);

WHEREAS, the parties engaged in private mediation on September 21, 2011, and executed a Memorandum of Understanding regarding final settlement of this case at the mediation;

WHEREAS, the parties sought a stay pending the execution of a definitive agreement, which was granted by Judge Richard Seeborg on September 23, 2011 (Dkt. 216);

WHEREAS, the parties were unable to reach a final agreement regarding settlement despite lengthy and good faith settlement negotiations (Dkt. 217, 219, 220);

WHEREAS, the parties have meet and conferred regarding deadlines, motions, and other activities, and have agreed that Plaintiffs TechCrunch, Inc. and CrunchPad, Inc.’s (collectively, Plaintiffs”) opposition to the Motion will be due on December 2, 2011 and Fusion Garage’s reply will be due on December 9, 2011;

WHEREAS, Judge Richard Seeborg agreed, *inter alia*, to the parties’ stipulated briefing schedule and directed the parties to this Court to set the hearing date for the Motion (Dkt. 222);

WHEREAS, the parties have met and conferred and agreed to have the Motion heard on December 20, 2011, the Court’s schedule permitting;

NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the parties identified below pursuant to Magistrate Judge Grewal’s December 2010 Standing Order that, subject to Court approval, Fusion Garage’s Motion to Compel (Dkt. 212) shall be heard on December 20, 2011 at 10:00 a.m. in the Courtroom of the Honorable Paul S. Grewal of the United States District Court for the Northern District of California, or as soon thereafter as the matter can be heard.

Dated: November 23, 2011 WINSTON & STRAWN LLP

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By: /s/
David S. Bloch
Attorneys for Plaintiffs

Dated: November 23, 2011

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/
Evette D. Pennypacker
Attorneys for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: November ___, 2011

The Honorable Paul S. Grewal
United States District Court Magistrate Judge

