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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TECHCRUNCH, INC., et al.

Plaintiffs,

vs.

FUSION GARAGE PTE. LTD.,

Defendant.

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

JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DATE WRITTEN
DISCOVERY RESPONSES ARE DUE

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

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

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

7 WHEREAS, prior to the Court ordered stay, the parties propounded the following sets of
8 written discovery: Defendant's Requests for Production (Set 4), Interrogatories (Set 3), and
9 Requests for Admission (Set 1); and Plaintiffs' Requests For Production (Set 8) and Interrogatories
10 (Set 4) (collectively, "Written Discovery");

11 WHEREAS, the parties had previously stipulated to serve responses to the Written Discovery
12 on December 16, 2011, which was approved by the Court in an order dated November 11, 2011
13 (Dkt. 221, Dkt. 222);

14 WHEREAS, Defendant filed a Motion to Compel Production of Documents on September 9,
15 2011 (Dkt. 212);

16 WHEREAS, in accordance with the parties' stipulated schedule, approved by the Court in an
17 order dated November 11, 2011 (Dkt. 221, Dkt. 222), Plaintiffs filed an Opposition to the Motion to
18 Compel on December 2, 2011 (Dkt. 226);

19 WHEREAS, the Court entered an order scheduling the hearing on the Motion to Compel on
20 January 3, 2012 (Dkt. 224);

21 WHEREAS, Quinn Emanuel Urquhart & Sullivan, LLP filed a motion to withdraw as
22 counsel of record for Fusion Garage on December 13, 2011 ("Quinn Emanuel's Motion") (Dkt.
23 230);

24 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the
25 parties identified below that, subject to Court approval, the December 16, 2011 date to provide
26 responses to the parties' Written Discovery, shall be continued to a date mutually agreeable between
27 the parties in light of Quinn Emanuel's Motion.

28

1 NOW THEREFORE, it is hereby further stipulated by the undersigned counsel on behalf of
2 the parties identified below that, subject to Court approval, the Motion to Compel shall be
3 withdrawn, without prejudice to its reintroduction after the resolution of Quinn Emanuel's Motion.

4 Dated: December 15, 2011

WINSTON & STRAWN LLP

6 By: /s/
7 David S. Bloch

8 Attorneys for Plaintiffs

9 Dated: December 15, 2011

QUINN EMANUEL URQUHART & SULLIVAN, LLP

11 By: /s/
12 Evette D. Pennypacker

13 Attorneys for Defendant

14
15 PURSUANT TO STIPULATION, IT IS SO ORDERED:
16

17
18 DATED: December __, 2011

19
20 _____
21 The Honorable Richard Seeborg
22 United States District Court Judge
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ATTESTATION

I, Evette D. Pennypacker, hereby attest, pursuant to N.D. Cal. General Order No. 45, that I have obtained the concurrence to the filing of this document of each signatory hereto.

By: /s/
Evette D. Pennypacker

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