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9 Attorneys for defendant and Counterclaimant  
 10 PRIZE CORPORATION

11  
 12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN JOSE DIVISION

15  
 16 izmo CRM, INC.,  
 17 Plaintiff,  
 18 v.  
 19 PRIZE CORPORATION, and DOES 1  
 20 through 20, inclusive,  
 21 Defendants.

CASE NO. C10-00518 LHK

**STIPULATED REQUEST FOR ORDER  
 AND ~~PROPOSED~~ ORDER EXTENDING  
 DISCOVERY DEADLINE**

22 *AND RELATED COUNTER-CLAIM*

23  
 24 Pursuant to Civil Local Rules 6-2 and 7-12, this Stipulation and Order to Extend the  
 25 Discovery Cut-Off (the "Stipulation and Order") is made by and between Plaintiff and Counter-  
 26 defendant izmo CRM, Inc. and Defendant and Counterclaimant Prize Corporation in the above-  
 27 captioned matter for the limited purpose of allowing additional time for Prize Corporation to

1 depose Tej Soni, the president of izmo CRM, Inc. and to take the deposition of izmo CRM, Inc.'s  
2 designated representative per FRCP 30(b)(6).

3 By order of this court dated April 14, 2011, all discovery in this matter shall be completed  
4 by May 13, 2011. Mr. Soni was noticed on April 15, 2011 for a deposition on April 28, 2011 and  
5 the representative(s) of izmo CRM, Inc. were noticed on April 19, 2011 for a 30(b)(6) deposition  
6 on May 2, 2011. Per counsel for izmo CRM, Inc., Tej Soni, a citizen of India, is out of the United  
7 States until the end of May and cannot present himself for deposition at the noticed times.  
8 Counsel for izmo CRM, Inc. has represented that Mr. Soni will also be a designated  
9 representative for the 30(b)(6) deposition. The parties hereby agree and stipulate to extend the  
10 discovery cut-off date for the limited purpose of deposing Mr. Soni and izmo CRM per the  
11 deposition notices. Mr. Soni has agreed to present himself for deposition between June 1 through  
12 June 3.

13 Provided that Mr. Soni is available for each deposition on two of the three days June 1 -  
14 3, counsel do not anticipate that the requested time modification will have any other effect on the  
15 schedule for the case.

16 In the event that izmo CRM determines that Mr. Soni will not be its designated  
17 representative for the 30(b)(6) deposition, the same extension of time will apply to the deposition  
18 of whomever it designates in his place and izmo CRM will provide that witness for deposition  
19 before the expiration of the extended deadline.

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Dated: April 26, 2011

HOPKINS & CARLEY  
A Law Corporation

By: Shirley E. Jackson

Daniel F. Pyne  
Shirley E. Jackson  
Attorneys for Plaintiff and Counterdefendant  
izmo CRM, INC.

Dated: April 26, 2011

FARRIS BOBANGO BRANAN PLC

By: John DiNapoli

John DiNapoli  
Robert A. McLean  
Attorneys for Defendant and Counterclaimant  
PRIZE CORPORATION

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 1, 2011

Lucy H. Koh  
HON. LUCY H. KOH