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6 Attorneys for Plaintiff  
 NORTH AMERICA PHOTON INFOTECH LTD.

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

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 12 **North America Photon Infotech Ltd., a**  
 Mauritian Company,  
 13  
 Plaintiff;  
 14  
 v.  
 15  
 16 **Saks and Company dba Saks Fifth Avenue,**  
 Inc., a New York corporation,  
 17  
 Defendant.

Case No. 5:15-cv-00843-NC  
**STIPULATION AND ~~PROPOSED~~ ORDER TO  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE**  
 CMC Date: April 29, 2014  
 Before the Hon. Nathanael Cousins

Computerlaw Group LLP  
 www.computerlaw.com<sup>sm</sup>

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1 This Stipulation is entered into by Plaintiff North America Photon Infotech, Ltd. and  
2 Defendant Saks & Company by their respective counsel.

3 WHEREAS a Case Management Conference is currently set to be heard on April 29,  
4 2015;

5 WHEREAS the parties have previously stipulated to extend Defendant's time to respond  
6 to the complaint to May 8, 2015;

7 WHEREAS the parties have agreed to private mediation before a retired judge at JAMS  
8 on May 4, 2014;

9 WHEREAS the parties intend to consent to the jurisdiction of the magistrate judge;

10 THEREFORE, the parties stipulate to and request that the court (a) continue the Case  
11 Management Conference to May 20, 2015 or another late date at the Court's convenience, and  
12 (b) continue the deadline for submission of the Joint Case Management Statement to the date  
13 seven (7) days prior to such Case Management Conference, so that it occurs after the parties  
14 have completed their mediation and the response to the complaint has been filed.

15 IT IS SO STIPULATED:

16 COMPUTERLAW GROUP LLP

17 Dated: April 22, 2015 By: /s/ Christopher Sargent  
Christopher Sargent

18 Attorneys for Plaintiff  
19 NORTH AMERICA PHOTON INFOTECH LTD.

20 Dated: April 22, 2015 LOEB & LOEB LLP

21 By: /s/ David Grossman  
David Grossman

22 Attorneys for Defendant  
23 SAKS & COMPANY DBA SAKS FIFTH AVENUE, INC.

24 ~~PROPOSED~~ ORDER

25 IT IS ORDERED that the Case Management Conference be continued to May 20, 2015  
26 at 10:00 A.M. Parties must file their consent or declination by May 6, 2015.

27 Dated: April 23, 2015

28 The Honorable Nathanael Cousins  
United States Magistrate Judge

