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5 Attorney for Plaintiff  
 6 DeNovo Medical, Inc. and Ronald Fry

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

10 DeNovo Medical, Inc. and Ronald Fry

11 Plaintiffs,

12 vs.

13 Biotronik, Inc., James Maldonado, Marlou  
 14 Janssen, Jake Langer, Paul Woodstock, Peter  
 15 Elia, Mike Iversen, Rich Rimmer, John Lacey,  
 16 Mike Nitsch, Mike Boras, John Cain, Chris  
 Mulvanny, and Does 1-50

17 Defendants.

Case No: 5:17-CV-04195-HRL

STIPULATION TO EXTEND TIME TO  
 RESPOND TO MOTION FOR  
 EXTENSION OF TIME TO FILE  
 OPPOSITION TO DEFENDANTS  
 MOTIONS FOR ATTORNEYS' FEES

Date: August 8, 2018  
 Time: 10:00 A.M.  
 Dept: 2 – 17<sup>th</sup> Floor  
 Judge: William H. Orrick

1 The parties seek an extension of time to permit Plaintiffs to fully brief their oppositions to  
2 Defendants' motions for attorney fees. Due to the numerous motions set by Defendants for the  
3 same day, Plaintiffs' counsels' preexisting personal commitments, and for the reasons as stated in  
4 the motion for extension, Plaintiffs have been unable to complete their oppositions prior to the  
5 deadline.

6 There have been no previous modifications to this motion in this case. Further, the  
7 modification to the deadlines for this motion will not impact the schedule for this case as judgment  
8 has already been issued and the case is closed.

9 Accordingly, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 6-2, **IT IS**  
10 **HEREBY STIPULATED AND AGREED** by and between the parties hereto, through their  
11 undersigned attorneys, that:

- 12 (1) The time for Plaintiffs' opposition to the Defendants motions for attorney fees entered  
13 as docket numbers 85, 86, 87, 88, and 89, be extended from June 12, 2018 until July 3,  
14 2018
- 15 (2) The time for Defendants' reply to Plaintiffs' opposition be extended from July 19,  
16 2018 until July 17, 2018.

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DATED: June 12, 2018

DIEMER & WEI, LLP

By: /s/ Kathryn S. Diemer  
KATHRYN S. DIEMER  
Attorneys for Plaintiffs  
DeNovo Medical, Inc. and Ronald Fry

DATED: June 12, 2018

STOEL RIVES LLP

By: /s/ Edward C. Duckers  
EDWARD C. DUCKERS  
TODD A. HANCHETT  
MARGARET E. DALTON  
Attorneys for Defendant  
Biotronik, Inc.

DATED: June 12, 2018

HUGHES HUBBARD & REED LLP

By: /s/ Rita M. Haeusler  
RITA M. HAEUSLER  
Attorneys for Defendants  
James Maldonado, Marlou Janssen, Jake  
Langer, Paul Woodstock, Mike Iversen, John  
Lacey, Mike Nitsch, and Chris Mulvanny

DATED: June 12, 2018

MAYNARD, CRONIN, ERIKSON,  
CURRAN & REITER LLP

By: /s/ Michael D. Curran  
MICHAEL D. CURRAN  
Attorneys for Defendant Richard Rimmer

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DATED: June 12, 2018

COAST LAW GROUP LLP

By: /s/ David A. Peck  
DAVID A. PECK  
Attorneys for Defendant Peter Elia

DATED: June 12, 2018

WINSTON & STRAWN LLP

By: /s/ Krista M. Enns  
KRISTA ENNS  
Attorneys for Defendant Mike Boras

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~~PROPOSED~~ ORDER

Based upon the Stipulation of Dismissal filed by the parties, **IT IS ORDERED** as follows:

- (1) Plaintiffs' time to respond to Defendants' motions for attorney fees be extended until July 3, 2018;
- (2) Defendants' time to respond to respond to Plaintiffs' opposition to Defendants' motions for attorney fees be extended until July 17, 2018.

**IT IS SO ORDERED.**

Dated: June 14, 2018

  
\_\_\_\_\_  
HONORABLE WILLIAM H. ORRICK  
UNITED STATES JUDGE