

1 Andrew D. Skale (SBN 211096)
 askale@mintz.com
 2 Ben L. Wagner (SBN 243594)
 bwagner@mintz.com
 3 Justin S. Nahama (SBN 281087)
 jsnahama@mintz.com
 4 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.
 3580 Carmel Mountain Road, Suite 300
 5 San Diego, CA 92130
 Telephone: (858) 314-1500
 6 Facsimile: (858) 314-1501

7 Attorneys for Plaintiff
 HANGINOUT, INC.

8
 9 Margret M. Caruso (SBN 243473)
 Cheryl A. Galvin (SBN 252262)
 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 10 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, CA 94065
 11 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

12 Attorneys for Defendant
 13 GOOGLE, INC.

14 UNITED STATES DISTRICT COURT
 15 SOUTHERN DISTRICT OF CALIFORNIA
 16

17 HANGINOUT, INC., a Delaware
 18 corporation,

19 Plaintiff,

20 vs.

21 GOOGLE, INC., a Delaware
 22 corporation,

23 Defendant.

Case No. 3:13-cv-02811-AJB-NLS

**JOINT MOTION FOR EARLY
 NEUTRAL EVALUATION
 CONFERENCE**

Courtroom 13B
 The Honorable Nita L. Stormes

1 WHEREAS, Hanginout, Inc. (“Plaintiff”) filed its Complaint on November 26,
2 2013 (“Complaint”);

3 WHEREAS, Google Inc. (“Defendant”) filed its Motion to Dismiss the
4 Complaint on January 13, 2014;

5 WHEREAS, Plaintiff filed its Motion for Preliminary Injunction on January
6 22, 2014;

7 WHEREAS, Plaintiff filed a First Amended Complaint on January 28, 2014;

8 WHEREAS, the Court issued a January 29, 2014 Order Mooting Defendant’s
9 Motion to Dismiss in light of Plaintiff’s Amended Complaint;

10 WHEREAS, in an effort to save the Court and the parties time, money and
11 resources with the pending preliminary injunction and other anticipated motions, the
12 Parties request an Early Neutral Evaluation (“ENE”) to occur on February 27, 2014,
13 or, alternatively, March 5 or 6.

14 WHEREAS, the parties believe an expedited ENE may be helpful in mooting
15 the preliminary injunction motion and facilitating a final resolution of the action.

16 NOW THEREFORE, THE PARTIES JOINTLY MOVE that an ENE be
17 scheduled for February 27, 2014, or, alternatively, March 5 or 6.

18 Dated: January 29, 2014

MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO PC

19
20 By /s/Andrew Skale, Esq.
Andrew D. Skale

21
22 Attorneys for Plaintiff
HANGINOUT, INC.

23
24 Dated: January 29, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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26 By: /s/Margret M. Caruso, Esq.
Margret M. Caruso, Esq.

27 Attorneys for Defendant
28 GOOGLE INC.

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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Margret Caruso, counsel for Defendant Google, Inc., and that I have obtained Ms. Caruso’s authorization to affix her electronic signature to this document.

Dated: January 29, 2014

MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO PC

By /s/Andrew Skale, Esq.
Andrew D. Skale
Ben L. Wagner
Justin S. Nahama

Attorneys for Plaintiff
HANGINOUT, INC.

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