UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS Western Division

EXCELSIOR PRINTING COMPANY,

Plaintiff,

Civil Action No. 3:12-cv-30200-MAP

v.

MATTHEW INMAN and PAPYRUS-RECYCLED GREETINGS, INC.,

Defendants.

<u>THIRD JOINT STIPULATION EXTENDING TIME</u> <u>TO RESPOND TO PLAINTIFF'S COMPLAINT</u>

Plaintiff Excelsior Printing Company ("Excelsior") and Defendant Matthew Inman ("Inman") stipulate, subject to Court approval, to extend the deadline for Inman to answer or otherwise respond to the Complaint to May 6, 2013.

Excelsior filed the Complaint on November 20, 2012. Excelsior and Inman previously filed, and the Court granted, a stipulation extending Inman's deadline to answer or otherwise respond to February 27, 2013. Additionally, Excelsior and Inman previously filed, and the Court granted, a second stipulation extending Inman's deadline to answer or otherwise respond to April 12, 2013.

Excelsior and Inman are still engaged in substantive discussions to resolve the case and would like additional time to engage in further discussions. The proposed extension will not affect any currently pending deadlines, as there are no other dates (e.g., hearing dates, discovery cut-off dates, hearing deadlines, pre-trial conference dates, or trial dates) currently set in this matter. Additionally, one of the other defendants in the case currently has a deadline of May 6, 2013 to file an answer or responsive pleading, so extending the deadline for Inman to the same date would bring all parties on the same timeline for responding to Excelsior's Complaint.

As set forth in the Declaration of Venkat Balasubramani (submitted herewith), the

Defendant acted diligently in seeking the present extension and there is good cause for granting

it. A proposed order is attached hereto.

Respectfully submitted, this 8th day of April, 2013.

<u>/s/ Venkat Balasubramani</u> Venkat Balasubramani (*pro hac vice*) Focal PLLC 800 Fifth Avenue, Suite 4100 Seattle, Washington 98104 Tel: (206) 529-4827 Fax: (206) 260-3966 Email: venkat@focallaw.com <u>/s/ Christopher M. Hennessey</u> Christopher M.Hennessey Cohen Kinne Valicenti & Cook, LLP 28 North Street 3rd Floor Pittsfield, MA 01201 413-443-9399 Email: chennessey@cohenkinne.com

Attorney for Plaintiff Excelsior Printing Co.

<u>/s/ Matthew Saunders</u> Aaron Silverstein (BBO# 660716) Arpiar M. Saunders (BBO# 664997) Saunders & Silverstein LLP 14 Cedar Street, Suite 224 Amesbury, MA 01913 Tel: (978) 463-9100 Fax: (978) 463-9109

Attorneys for Defendant Matthew Inman

CERTIFICATE OF SERVICE

I hereby certify that this document filed on April 8, 2013, through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on the above date.

<u>/s/ Venkat Balasubramani</u> Venkat Balasubramani