

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,
a Delaware corporation; BASIC FUSION, INC.,
a Delaware corporation; CONNEXUS CORP.,
a Delaware corporation; and FIRSTLOOK, INC.,
a Delaware corporation,

Defendants.

Enrico Schaefer (P43506)
Brian A. Hall (P70865)
TRAVERSE LEGAL, PLC
810 Cottageview Drive, Unit G-20
Traverse City, MI 49686
231-932-0411
enrico.schaefer@traverselegal.com
brianhall@traverselegal.com
Lead Attorneys for Plaintiff

Anthony P. Patti (P43729)
HOOPER HATHAWAY, PC
126 South Main Street
Ann Arbor, MI 48104
734-662-4426
apatti@hooperhathaway.com
Attorneys for Plaintiff

William A. Delgado
WILLENKEN WILSON LOH & LIEB LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017
(213) 955-9240
williamdelgado@willenken.com
Lead Counsel for Defendants

Nicholas J. Stasevich (P41896)
Benjamin K. Steffans (P69712)
BUTZEL LONG, P.C.
150 West Jefferson, Suite 100
Detroit, MI 48226
(313) 225-7000
stasevich@butzel.com
steffans@butzel.com
Local Counsel for Defendants

STIPULATION EXTENDING TIME

WHEREAS, on May 25, 2010, the Court entered an Order Compelling Discovery (Dock
No. 82);

WHEREAS, pursuant to the Order, NCS must produce supplemental responses and documents within twenty-five (25) days of the Order;

WHEREAS, NCS is ready to produce such responses and documents in accordance with the Order with one exception, that being with respect to Request for Production No. 40 which required the production of certain e-mails from January 1, 2008 to January 1, 2009;

WHEREAS, counsel for NCS is in the process of reviewing e-mails for responsiveness, privilege, and time frame but will need to review approximately 600,000 e-mails;

WHEREAS, NCS has asked Plaintiff The Weather Underground, Inc. whether it would be amenable to a granting NCS an extension of time until June 28, 2010 for the production of such e-mails;

WHEREAS, NCS has offered to produce responsive, non-privileged e-mails in a Concordance database format to Plaintiff for ease of review.

WHEREAS, Plaintiff is amenable to such an extension of time.

//

//

THEREFORE, THE PARTIES STIPULATE THAT NCS shall have up to and including June 28, 2010 to produce e-mails responsive to Request for Production No. 40.

Dated: June 21, 2010

/s/Enrico Schaefer (by authorization)

Enrico Schaefer (P43506)
Brian A. Hall (P70865)
TRAVERSE LEGAL, PLC
810 Cottageview Drive, Unit G-20
Traverse City, MI 49686
231-932-0411
enrico.schaefer@traverselegal.com
brianhall@traverselegal.com
Lead Attorneys for Plaintiff

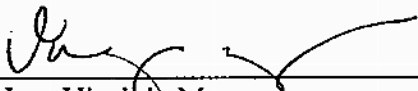
/s/William A. Delgado

William A. Delgado
WILLENKEN WILSON LOH & LIEB, LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017
(213) 955-9240
williamdelgado@willenken.com
Lead Counsel for Defendants

IT IS SO ORDERED

It is so ordered.

Dated: 6/30/10



Hon. Virginia Morgan
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2010, I electronically filed the foregoing paper with the Court using the ECF system which will send notification of such filing to the following:

Enrico Schaefer (P43506)
Brian A. Hall (P70865)
TRAVERSE LEGAL, PLC
810 Cottageview Drive, Unit G-20
Traverse City, MI 49686
231-932-0411
enrico.schaefer@traverselegal.com
brianhall@traverselegal.com
Lead Attorneys for Plaintiff

Anthony P. Patti (P43729)
HOOPER HATHAWAY, PC
126 South Main Street
Ann Arbor, MI 48104
734-662-4426
apatti@hooperhathaway.com
Attorneys for Plaintiff

Nicholas J. Stasevich (P41896)
Benjamin K. Steffans (P69712)
BUTZEL LONG, P.C.
150 West Jefferson, Suite 100
Detroit, MI 48226
(313) 225-7000
stasevich@butzel.com
steffans@butzel.com
Local Counsel for Defendants

William A. Delgado (admitted *pro hac vice*)
WILLENKEN WILSON LOH & LIEB LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017
(213) 955-9240
williamdelgado@willenken.com
Lead Counsel for Defendants

/s/William A. Delgado

William A. Delgado
WILLENKEN WILSON LOH & LIEB, LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017
(213) 955-9240
williamdelgado@willenken.com
Lead Counsel for Defendants

PROOF OF SERVICE

The undersigned certifies that the foregoing stipulation and order extending time was served upon counsel of record via the Court's ECF System and/or U. S. Mail on June 30, 2010.

s/Jane Johnson

Case Manager to

Magistrate Judge Virginia M. Morgan