

1 John K. Gallagher, Esq.
 Nevada State Bar No. 956
 2 GUILD, GALLAGHER & FULLER, LTD.
 100 West Liberty Street, Suite 800
 3 P.O. BOX 2838
 Reno, Nevada 89505
 4 Telephone: 775-786-2366
 Facsimile: 775-322-9105
 5 *jpgallagher@ggfltd.com*
 6 *Attorney for Plaintiff Microsoft Corporation*

7
 8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10	MICROSOFT CORPORATION,)	Case No. 2:16-cv-00452-GMN-VCF
11	Plaintiff,)	STIPULATION AND PROPOSED
12	v.)	ORDER EXTENDING THE TIME
13	JULIANNA PAK, an individual d/b/a)	TO RESPOND TO THE COMPLAINT
14	IBENEVOLO and IBENEVOLO.COM;)	FOR DAMAGES AND INJUNCTIVE
15	JULIANNA PAK, an individual; and MARK)	RELIEF
16	PAK, an individual,)	
	Defendants.)	(Second Request)

17 Plaintiff Microsoft Corporation ("Microsoft") by and through its undersigned counsel of
 18 record, and Defendants Julianna Pak, an individual doing business as ibenevolo and
 19 ibenevolo.com; Julianna Pak, an individual; and Mark Pak, an individual (collectively
 20 "Defendants") by and through their undersigned counsel, stipulate as follows:
 21

- 22 1. Microsoft filed a Complaint for Damages and Injunctive Relief on March 2, 2016.
- 23 2. Microsoft and Defendants previously agreed to stipulate to an extension of time for
 24 Defendants to file an answer or otherwise respond to the Complaint until on or before Friday,
 25 April 15, 2016, which the Court approved by Order.
- 26 3. The parties are involved in good faith settlement negotiations. More specifically,
 27 Defendants have provided Microsoft with certain documents, which Microsoft is reviewing, and
 28

1 the parties anticipate needing at least thirty additional days to continue pursue settlement
2 discussions.

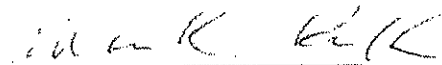
3 WHEREFORE, Microsoft and Defendants request that an order be entered extending the
4 deadline for Defendants to answer or otherwise respond to the Complaint for Damages
5 and Injunctive Relief until on or before Friday, May 20, 2016.
6

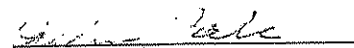
7 IT IS SO STIPULATED:

8 Respectfully Submitted,

Respectfully Submitted,

9
10 By: /s/ John K. Gallagher
11 John K. Gallagher, Esq.
12 Nevada State Bar No. 956
100 West Liberty Street, Suite 800
P.O. BOX 2838
Reno, Nevada 89505

By: 
Mark Pak


Julianna Pak

13 *Attorney for Plaintiff*
14 *Microsoft Corporation*

13 *For Defendants Mark Pak, an*
14 *individual; Julianna Pak, an individual;*
15 *and Julianna Pak, an individual d/b/a*
16 *ibenevolo and ibenevolo.com*

17 IT IS SO ORDERED:

18 

19 _____
20 UNITED STATES ~~DISTRICT~~ JUDGE
4-15-2016

21 DATED: _____
22
23
24
25
26
27
28

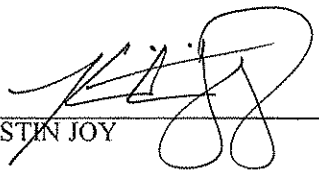
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P. 5(b), I certify that I am an employee of GUILD, GALLAGHER & FULLER, LTD., and that on this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND PROPOSED ORDER EXTENDING THE TIME TO RESPOND TO THE COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF** on the parties and/or their attorneys by placing a true and correct copy thereof enclosed in sealed envelopes with postage prepaid thereon in the United States Post Office mail at 100 West Liberty Street, Suite 800, Reno, Nevada 89501, addressed as follows:

Mark and Julianna Pak
33 Benevolo Drive
Henderson, Nevada 89011

DATED this 15th day of April, 2016.


KRISTIN JOY