

Obi I. Iloputaife (CA Bar No. 1992271)
obi@cotmanip.com
admitted pro hac vice
Jayson S. Sohi (CA Bar No. 293176)
jayson@cotmanip.com
admitted pro hac vice
COTMAN IP LAW GROUP, PLC
35 Hugus Alley, Suite 210
Pasadena, CA 91103
(626) 405-1413/FAX: (626) 316-7577

Attorneys for Plaintiff TZU Technologies,
LLC

Steven A. Caloiaro
Nevada Bar No. 12344
Email: scaloiaro@dickinsonwright.com
8363 West Sunset Road, Suite 200
DICKINSON WRIGHT PLLC
Las Vegas, Nevada 89113-2210
Tel: (702) 550-4400
Fax: (844) 670-4009

Hector J. Ribera (CA Bar No. 221511
(pending admission pro hac vice)
hector@martonribera.com
MARTON RIBERA SCHUMANN & CHANG LLP
548 Market St. Suite 36117
San Francisco, CA 94104
(415) 360-2511

Attorneys for Defendant, LELO Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TZU Technologies, LLC

Plaintiff,

v.

LELO Inc.

Defendant.

Case No. 2:17-cv-01952-MMD-GWF

**STIPULATION AND
PROPOSED ORDER TO
EXTEND TIME TO RESPOND
TO COMPLAINT
(Second Stipulation)**

[LR IA 6-1(a)]

Pursuant to Local Civil Rule 6-1(a), Plaintiff TZU Technologies, LLC ("Plaintiff") and Defendant Lelo Inc. ("Defendant") (jointly "the Parties"), by and through their respective counsel, hereby stipulate as follows:

1 WHEREAS, Plaintiff filed its Complaint against Defendant on July 18, 2017 (ECF No.
2 1);

3 WHEREAS Defendant was served with the summons and complaint on September 22,
4 2017;

5 WHEREAS Defendant was required to serve its respective answer and/or response to the
6 Complaint by October 13, 2017;

7 WHEREAS Plaintiff and Defendant jointly stipulated to a first extension of time to
8 answer and/or respond to the Complaint and the Court granted the stipulated request extending
9 the time for Defendant's answer and/or response to the Complaint to November 13, 2017 (first
10 extension)(ECF No. 13);

11 WHEREAS Plaintiff and Defendant have been engaged in informal settlement
12 discussions in an attempt to resolve their dispute and wish to continue such discussions;

13 WHEREAS Plaintiff and Defendant have again agreed to extend the date for Defendant
14 to answer and/or respond to the Complaint by an additional thirty (30) days, up to and including
15 December 13, 2017; and

16 WHEREAS this is Defendant' second request for extension of time to respond to the
17 Complaint in this action;

18 WHEREAS the stipulation is made in good faith to allow the parties to continue to
19 discuss a settlement agreement; and

20 WHEREAS the stipulation is not an attempt to delay proceedings.

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
22 through their respective counsel, that Defendant Lelo Inc. shall have an extension, up to and
23 including December 13, 2017, to answer and/or respond to Plaintiff's Complaint in this action.

Respectfully submitted,

Dated: November 9, 2017

Dated: November 9, 2017

COTMAN IP LAW GROUP, PLC

By: /s/ Jayson S. Sohi

Jayson S. Sohi

Attorneys for Plaintiff

TZU Technologies, LLC

DICKINSON WRIGHT PLLC

/s/ Steven A. Caloiaro

Steven A. Caloiaro

Nevada Bar No. 12344

8363 West Sunset Road, Suite 200

Las Vegas, Nevada 89113-2210

Tel: (702) 550-4400

Fax: (844) 670-4009

Hector J. Ribera

hector@martonribera.com

**MARTON RIBERA SCHUMANN & CHANG
LLP**

548 Market Street, Suite 36117

San Francisco, CA 94104

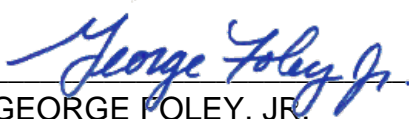
Tel: (415) 360 2511

Attorneys for Defendant LELO Inc.

ORDER

IT IS SO ORDERED.

Dated: _ November 13, 2017



GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Dickinson Wright, PLLC, and that on this date a true and correct copy of the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT** will be served upon counsel of record via the Court's ECF System electronic mail.

DATED: November 9, 2017

/s/ Cindy Grinstead

An Employee of Dickinson Wright, PLLC