Alan L. Sullivan (3152)
Todd M. Shaughnessy (6651)
Snell & Wilmer L.L.P.
15 West South Temple, Suite 1200
Beneficial Tower
Salt Lake City, Utah 84101-1004
Telephone: (801) 257 1900

Telephone: (801) 257-1900 Facsimile: (801) 257-1800

Mark Lambert (Cal. Bar No. 197410) Mark Weinstein (Cal Bar No. 193043) Cooley Godward Kronish, LLP Five Palo Alto Square Palo Alto, California 94306-2109 Telephone: (650) 843-5003

Attorneys for Plaintiff

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

PUBLIC ENGINES, INC., a Delaware Corporation,

Plaintiff,

VS.

REPORTSEE, INC., a Delaware Corporation,

Defendant.

STIPULATED MOTION FOR ENTRY OF DISCOVERY PLAN AND SCHEDULING ORDER

Case No. 2:10-cv-317

Honorable Tena Campbell

Plaintiff Public Engines, Inc. ("Public Engines") and Defendant ReportSee, Inc. ("ReportSee") stipulate and jointly move for an order modifying the schedule established at the April 14 Status Conference. The parties seek a slight modification to the discovery and filing deadlines to accommodate the schedules of their clients and the rigors of document production. The parties are not requesting that the Court move the June 11, 2010 preliminary injunction hearing date, which is almost three weeks from the date that Plaintiff's reply would be due under the proposed schedule.

The parties stipulate and jointly move to set the deadlines as follows:

April 30, 2010: Completion of Discovery

May 14, 2010: ReportSee's Opposition to Public Engine's Preliminary Injunction

May 24, 2010: Public Engine's Reply In Support Of Its Preliminary Injunction

Motion (Currently due by May 17, 2010.)

June 11, 2010: Preliminary Injunction Hearing

The parties also request leave to take the depositions of the named declarants outside of the discovery schedule. The parties have agreed that ReportSee will take the depositions of Public Engines' declarants on May 4-5, 2010. They have also agreed that Public Engines will take the deposition of ReportSee's declarant on May 18, 2010.

Dated this 27th day of April, 2010

**BOWIE & JENSEN, LLC** 

/s/ Joshua A. Glikin

Joshua A. Glikin

Attorney for ReportSee, Inc. (Signed with Permission)

Dated this 27th day of April, 2010

## Snell & Wilmer L.L.P.

/s/ Alan L. Sullivan

Alan L. Sullivan
Todd. M. Shaughnessy
Attorneys for Defendant
Public Engines, Inc.

## **Certificate of Service**

I certify that on the 27th day of April, 2010, a true and correct copy of the Stipulated Motion for Entry of Discovery Plan and Scheduling Order has been served on the following through ECF:

Walter E. Diercks wdiercks@rwdhc.com

Joshua A. Glikin glikin@bowie-jensen.com

**Jeffrey J. Hunt** jhunt@parrbrown.com

**David C. Reymann** dreymann@parrbrown.com

/s/ Alan L. Sullivan