

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CVENT, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:10-cv-481(LMB)
)	
EVENTBRITE, INC.)	
)	
and DOES 1-10, individuals and/or business)	
entities of unknown nature,)	
)	
Defendants.)	

**STIPULATION AND CONSENT ORDER
REGARDING PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY
CONCERNING IDENTITY OF DEFENDANTS DOE 1-10 AND
LITIGATION STANDSTILL**

Plaintiff Cvent, Inc. (“Cvent”) and Defendant Eventbrite, Inc. (“Eventbrite”) hereby stipulate and agree as follows:

1. Eventbrite consents to the relief requested in Plaintiff’s Motion for Expedited Discovery Concerning Identity of Defendants Doe 1-10. Plaintiff shall be permitted to issue a Request for Production of Documents and a subpoena *duces tecum* substantially in the form attached to this Stipulation and Consent Order as attachments A and B, respectively. Eventbrite agrees to produce the documents specified in the Request for Production of Documents within ten (10) days, as specified in that Request.

2. Subject to the discovery requests set forth in paragraph 1, above, Cvent agrees to refrain from prosecution of this litigation against Eventbrite for a period of ten (10) days from the date of this Stipulation and Consent Order. Nothing in this Stipulation and Consent Order is intended to constrain or prohibit Cvent from prosecuting this litigation against defendants Doe 1-10, including but not limited to the service of process on one or more of those defendants. Eventbrite's time to answer or otherwise respond to the Complaint in this action shall be extended by ten (10) days.
3. During the pendency of this action, each party agrees not to download or otherwise obtain data from the website of the other, or access the other's website without authorization, and will not induce, encourage, cause or materially contribute to any other person or entity doing the same. Nothing herein shall bar Cvent from accessing Eventbrite's website to monitor compliance with this Order.
4. During the pendency of this action, Eventbrite agrees to maintain the status quo, as of the date of this Order, of the contents of the relevant sections of its website, specifically including the "venue directory" section referenced in Cvent's Complaint, and shall not create or publish any other sections providing comparable functionality.
5. Paragraphs 3 and 4 of this Stipulation and Consent Order shall not apply to the actions of outside counsel and their consultants taken in connection with the prosecution or defense of this action.

6. Cvent and Eventbrite agree that this Stipulation and Consent Order render Plaintiff's Motion for Temporary Restraining Order and Motion for Preliminary Injunction moot as to Eventbrite, but does not does not affect those Motions as to any other person or entity, including but not limited to defendants Doe 1-10.

Dated: May 19, 2010

Respectfully submitted,

PLAINTIFF CVENT, INC.

DEFENDANT EVENTBRITE, INC.

 /s/ Oliver Garcia
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Attorneys for Eventbrite, Inc.

SO ORDERED.

Date: _____

Leonie M. Brinkema
United States District Judge

