

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

MALIBU MEDIA, LLC,)	
)	
)	
Movant,)	Civil Action No. 6:13-MC-5
)	
v.)	
)	Action Pending in:
Verizon Online, LLC,)	Eastern District of Pennsylvania
)	2:12-cv-02078-MMB
Respondent.)	
)	
_____)	

CERTIFICATE OF CONFERENCE

Movant, by and through undersigned counsel, and pursuant to Local Rule 7.1, hereby certifies that on April 8, 2013, a telephonic conference was held between Movant's counsel Keith Lipscomb, Esq. and counsel for Respondent, Giancarlo Urey, Esq., in a good faith effort to resolve the issues raised by this Motion. The parties further conferred through email on April 11, 2013, April 12, 2013, April 17, 2013, and April 18, 2013.

While Respondent maintains its objections, the parties are working on a stipulation that may make taking Respondent's deposition in the underlying matter unnecessary. The Defendant in the underlying matter has agreed in principle to consent to allowing the documents produced by Respondent into evidence without a deposition but has not agreed to the exact wording of the stipulation. The parties request a few more days to finalize the process and ascertain whether the wording is sufficient. Movant will advise the Court by April 26, 2013 whether a written stipulation was obtained. If it is not obtained Movant will continue to proceed with its Motion.

Movant respectfully submits that it has conferred in good faith in an attempt to resolve the issues without the necessity of further court proceedings.

DATED: April 18, 2013

Respectfully submitted,

Ni, Wang & Associates, PLLC

By: /s/ Hao Ni _____
Hao Ni, Esq.
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via electronic correspondence and U.S. Mail to: Giancarlo Urey, Esq. [GUrey@mof.com], Morrison & Foerster, LLP, 555 West Fifth Street, Los Angeles, California 90013-1024, on this 18th day of April, 2013.

By: /s/ Hao Ni _____
Hao Ni, Esq.