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 10 VEOH NETWORKS, INC.

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15 Attorney for Plaintiff
 IO GROUP, INC.

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **SAN JOSE DIVISION**

21	IO GROUP, INC.)	Case No. C 06-3926 HRL
)	
22	Plaintiff,)	STIPULATION REQUESTING THE
)	COURT TO EXTEND THE TIME FOR
23	vs.)	DEFENDANT TO FILE A BILL OF COSTS
)	AND MOTION FOR FULL COSTS AND
24	VEOH NETWORKS, INC.)	ATTORNEYS' FEES
)	
25	Defendant.)	AND ORDER
)	

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1 Pursuant to Civil Local Rule 6-2, the parties jointly submit this *Stipulation Requesting the*
2 *Court to Extend the Time for Defendant to File a Bill of Costs and Motion for Full Costs and*
3 *Attorneys' Fees.*

4 The Court entered judgment for Defendant in this case on August 27, 2008. *See* Declaration
5 of Matthew Scherb ¶ 2 (attached hereto).

6 Defendant's Bill of Costs and any motion for other costs and attorneys' fees are due this
7 Wednesday, September 10, 2008. *Id.* ¶ 3.

8 The parties are currently in the process of discussing ways to resolve the costs and attorneys'
9 fees issues without the need for the Court's intervention. In order to provide time to attempt to
10 resolve these issues, the parties respectfully request a one week extension of Defendant's deadline to
11 submit a Bill of Costs and any motion for other costs and attorneys' fees, so that Defendant's Bill of
12 Costs and any motion for other costs and attorneys' fees shall be due by September 17, 2008. *Id.* ¶
13 4.

14 Previously in this case, the Court granted, after stipulation, extensions of time for Defendant
15 to answer Plaintiff's Complaint and for Defendant to respond to Plaintiff's Motion to Consolidate.
16 *Id.* ¶ 5.

17 The parties do not expect the requested extension to impact the progress of this case. *Id.* ¶ 6.

18 Respectfully submitted,

19 Dated: September 9, 2008

WINSTON & STRAWN, LLP

20 By: /s/
21 Michael S. Elkin
22 Jennifer A. Golinveaux
23 Matthew A. Scherb
Attorneys for Defendant
VEOH NETWORKS, INC.

24 Dated: September 9, 2008

LAW OFFICES OF GILL SPERLEIN

25 By: /s/
26 Gill Sperlein
27 Attorneys for Plaintiff
IO GROUP, INC.

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CONCURRENCE IN FILING

Concurrence in the filing of the above was obtained from Gill Sperlein.


Dated: September 9, 2008

/s/
Matthew A. Scherb

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 10, 2008


UNITED STATES MAGISTRATE JUDGE
Howard R. Lloyd

1 **DECLARATION OF MATTHEW SCHERB**

2 I, Matthew Scherb, declare:

3 1. I am an attorney at law, duly licensed to practice law in the State of California. I am
4 an associate with the law firm of Winston & Strawn LLP, counsel of record for Defendant Veoh
5 Networks, Inc. in this action, and am authorized to make this declaration in that capacity. I make
6 this declaration of my own personal knowledge and, if called upon to testify, could and would testify
7 competently as stated herein.

8 2. The Court entered judgment for Defendant in this case on August 27, 2008.

9 3. Defendant's Bill of Costs and any motion for other costs and attorneys' fees are due
10 this Wednesday, September 10, 2008.

11 4. The parties are currently in the process of discussing ways to resolve the costs and
12 attorneys' fees issues without the need for the Court's intervention. In order to provide time to
13 attempt to resolve these issues, the parties respectfully request a one week extension of Defendant's
14 deadline to submit a Bill of Costs and any motion for other costs and attorneys' fees, so that
15 Defendant's Bill of Costs and any motion for other costs and attorneys' fees shall be due by
16 September 17, 2008.

17 5. Previously in this case, the Court granted, after stipulation, extensions of time for
18 Defendant to answer Plaintiff's Complaint and for Defendant to respond to Plaintiff's Motion to
19 Consolidate.

20 6. The parties do not expect the requested extension to impact the progress of this case.

21 Dated: September 8, 2008

22 /s/ _____
23 Matthew Scherb