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8 Attorney for Plaintiff
 9 IO GROUP, INC.

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN JOSE DIVISION**

)	
)	CASE NO. C-06-3926 (HRL)
IO GROUP, INC., a California corporation,)	
)	DECLARATION OF GILL SPERLEIN IN
Plaintiff,)	SUPPORT OF STIPULATION AND
)	[PROPOSED] ORDER FOR FURTHER
vs.)	EXTENSION OF TIME FOR
)	DEFENDANTS TO RESPOND TO
VEOH NETWORKS, Inc, a California)	PLAINTIFF'S NOTICE OF RELATED
Corporation,)	CASES; AND TO RESET DATES
)	RELATING TO CASE MANAGEMENT
Defendant.)	CONFERENCE.
)	
)	
)	

21 I, GILL SPERLEIN, declare:

- 22 1. I am an attorney at law licensed to practice in the State of California and attorney of
- 23 record for Plaintiff Io Group, Inc.
- 24
- 25 2. On behalf of Plaintiff Io Group, Inc. I filed in the Northern District of California
- 26 actions against Veoh Networks, Inc. on June 23, 2006 (C-06-3926 (HRL)); against Data
- 27 Conversions, Inc. on August 23, 2006 (C-06-5162 (HRL)); and against Webnovas Technologies,
- 28 Inc., and Gonetmarket, Inc., a Nevada Corporation on August 30, 2006 (C-06-5334 (JSW)).

1 3. On September 11, 2006 I filed a Notice of Related Cases in the form of a Motion
2 for Administrative Relief seeking to relate these three cases.

3 4. On September 12, 2006, parties stipulated to extend to September 25, 2006, the
4 deadline for Veoh Networks to answer or otherwise respond to Io Group, Inc.'s Complaint in the
5 matter of *Io Group, Inc. v. Veoh, Networks, Inc.*, C-06-3926 (HRL) and to allow Veoh Networks
6 until September 25, 2006 to file its response to Plaintiff's Notice of Related Cases referred to in
7 the Stipulation as a Motion to Consolidate. This Court entered an order pursuant to the stipulation
8 on September 14, 2006.

9 5. On September 18, 2006, parties in the matter of *Io Group, Inc. v. Webnovas*
10 *Technologies, Inc. and Gonetmarket, Inc.*, C-06-5334 (JSW) stipulated to extend to October 10,
11 2006, the deadline for Webnovas Technologies to answer or otherwise respond to Io Group, Inc.'s
12 Complaint. That stipulation has been filed with the Court and is awaiting Judge Ware's approval
13 and Order.

14 6. On September 19, 2006, parties in the matter of *Io Group, Inc. v. Webnovas*
15 *Technologies, Inc. and Gonetmarket, Inc.*, C-06-5334 (JSW) stipulated to extend to October 10,
16 2006, the deadline for Gonetmarket, Inc. to answer or otherwise respond to Io Group, Inc.'s
17 Complaint. That stipulation has been filed with the Court and is awaiting Judge Ware's approval
18 and Order.

19 7. On September 20, 2006, in the matter of *Io Group, Inc. v. Data Conversions, Inc.*,
20 C-06-065162 (HRL), plaintiff Io Group, Inc. granted defendant Data Conversions, Inc. until
21 October, 19, 2006 to file an answer or other responsive pleading. I agreed I would seek a
22 stipulation and an order from this Court staying any ruling on the Motion for Administrative relief
23 until after October 19, 2006 so that Data Conversions would have an opportunity to file an
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1 opposition or statement of non-opposition to that motion. Defendant Data Conversions' General
2 Counsel requested this extension because its agent to receive service of process had not informed
3 him of the service of the Summons and Complaint. He did not learn the company had been served
4 until I contacted him by facsimile on September 18, 2006. He was scheduled to leave on a prepaid
5 vacation on September 21, 2006.
6

7 8. The stipulation this declaration supports is necessary because based on the above
8 facts, defendants in the potentially related cases will not have sufficient time to file an opposition
9 or notice of non-opposition to Plaintiff's Notice of Related Cases until October 19, 2006.
10

11 9. Previously the Parties to this matter stipulated and the Court ordered that the initial
12 case management conference be recalendared from September 25 to October 17, 2006 and that
13 defendant's answer or other response to the Complaint and any opposition to the Notice of Related
14 Cases would not be due until September 25, 2006.
15

16 10. The effect of the requested time modification would allow parties to know whether
17 the cases were related prior to making decisions on ADR and prior to preparing initial disclosures
18 and preparing for the initial Case Management Conference.
19

20 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing
21 is true and correct.
22

23 Dated: *September 21, 2006*

/s/ Gill Sperlein

24 GILL SPERLEIN,
25 Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I am over 18 years of age, am employed in the county of San Francisco, at 69 Converse Street, San Francisco, California, 94103. I am readily familiar with the practice of this office for collection and processing of correspondence for mailing with United Parcel Service and correspondence is deposited with United Parcel Service that same day in the ordinary course of business.

Today I served the attached:

- **STIPULATION AND [PROPOSED] ORDER FOR FURTHER EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF’S NOTICE OF RELATED CASES; AND TO RESET DATES RELATING TO CASE MANAGEMENT CONFERENCE.**
- **DECLARATION OF GILL SPERLEIN IN SUPPORT OF STIPULATION**

by causing a true and correct copy of the above to be placed with United Parcel Service, Second Day Service at San Francisco, California in sealed envelopes with postage prepaid, addressed as follows:

In the case of
Io Group, Inc. v. Webnovas Technologies, et al., C-06-5334 (JSW)
Attorney’s for Webnovas Technologies, Inc. and Gonetmarket, Inc.
With Courtesy Copy to Judge Ware

Richard F. Cauley
Wang, Hartman, & Gibbs, PLC
1301 Dove Street, Suite 1050
New Port Beach , CA 92660-2812

In the case of
Io Group, Inc. v. Data Conversions., C-06-5162 (HRL)
Attorney for Data Conversions Inc.
With Courtesy Copy to Judge Lloyd

Lance Blundell, General Counsel
Data Conversions, Inc.
5300 Old Pineville Road, Suite 158
Charlotte, NC 28217

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on *September 21, 2006*.

/s/ Eric Burford
Eric Burford

I hereby attest that this is the declaration of Eric Burford and the original with Eric Burford's holographic signature is on file for production for the Court if so ordered, or for inspection upon request by any party. Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing is true and correct.

Dated: *September 21, 2006*.

/s/ Gill Sperlein
GILL SPERLEIN,
Counsel for Plaintiff Io Group, Inc.