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Attorney for Plaintiff
 IO GROUP, INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

)	
)	CASE NO. C-06-3926 (HRL)
)	
IO GROUP, INC., a California corporation,)	
)	STIPULATION AND [PROPOSED]
Plaintiff,)	ORDER TO EXTEND DISCOVERY
)	CUT-OFF DATES
vs.)	
)	
)	
VEOH NETWORKS, Inc, a California)	
Corporation,)	
)	
Defendant.)	
)	
)	

Pursuant to Civil Local Rule 6-2, Plaintiff Io Group, Inc. and Defendant Veoh Networks, Inc., hereby stipulate to extend certain discovery cutoff dates.

Plaintiff requested that Defendant stipulate to an extension of time because Plaintiff believes that it needs additional discovery and that the current discovery schedule does not allow enough time. Defendant has agreed to a thirty-day extension of currently scheduled deadlines as set forth below.

Although this case was originally filed on June 6, 2006, there was a dormant period during which the Court considered Plaintiff's Motion to Relate the matter to two later-filed cases. Upon

1 ordering the matters related, the Court significantly postponed the initial case management
2 conference in order that it be held in conjunction with the later-filed, related cases.

3 Previously, stipulations and orders resulted in the following time modifications.

4 On August 10, 2006 the parties stipulated and the Court ordered that Defendant have until
5 September 25, 2006 to file a pleading responsive to the Complaint and that the initial Case
6 Management Conference set for September 26, 2006 be reset for October 17, 2006.

7 On September 13, 2006, the parties stipulated and the Court subsequently ordered that
8 Defendant's Response to Plaintiff's Motion to Relate would be due on September 25, 2006.

9 On September 21, 2006 the parties stipulated and the Court subsequently ordered that the
10 Court not rule on Plaintiff's Motion to Relate until October 19, 2006 so that all parties had
11 sufficient time to respond. The Stipulation and Order also took the Case Management Conference
12 off calendar until after the Court ruled on the Motion to Relate.

13 Upon ordering the cases related on October 25, 2006, the Court set the Initial Case
14 Management Conference for all related cases for December 5, 2006.

15 Subsequently, Defense requested, Plaintiff stipulated, and the Court ordered, that the date
16 for exchanging initial disclosures be extended from the Court's original December 15, 2006
17 deadline to January 16, 2007.

18 This stipulation and proposed order if issued, would effect the discovery dates set by the
19 Court at the December 5, 2006 Case Management Conference. Moreover, other dates such as the
20 deadline for hearing dispositive motions may also need to be extended.

21 **WHEREAS** the Court previously set April 30, 2007 as the deadline for fact discovery;

22 **WHEREAS** the Court previously set June 22, 2007 as the deadline for expert discovery;

23 **WHEREAS** the Court indicated at the Case Management Conference that extensions
24 would be granted if reasonably necessary.

25
26 The parties do therefore stipulate and agree as follows:

- 27 1. To extend fact discovery cutoff until May 30, 2007;
- 28 2. To extend the Designation of Experts deadline until June 8, 2007;
3. To Extend the Designation of Rebuttal Experts until June 22, 2007;

4. To extend expert discovery cutoff until July 22, 2007; and
5. That the Court recalendar any other dates as appropriate.

SO STIPULATED.

Dated: 4/18/2007

/s/ Gill Sperlein
Gill Sperlein
THE LAW FIRM OF GILL SPERLEIN
Attorney's for Plaintiff

Dated: 4/18/2007

/s/ Jennifer A. Golinveaux
Jennifer A. Golinveaux
WINSTON & STRAWN, LLP
Attorney's for Defendant

I hereby attest that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: 4/18/2007

/s/ Gill Sperlein
Gill Sperlein
THE LAW FIRM OF GILL SPERLEIN
Attorney's for Plaintiff

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE HOWARD R. LLOYD
UNITED STATES MAGISTRATE JUDGE