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 9 IO GROUP, INC.

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

11))
12)) CASE NO. C-06-3926 (HRL)
13))
14)) STIPULATION AND [PROPOSED]
15)) ORDER TO EXTEND CERTAIN
16)) DISCOVERY CUT-OFF DATES
17))
18))
19))
20))

IO GROUP, INC., a California corporation,
 Plaintiff,
 vs.
 VEOH NETWORKS, Inc, a California Corporation,
 Defendant.

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

23 The extension of time is necessary in order to schedule three depositions that the parties
 24 were unable to schedule prior to the May 30, 2007 cut-off date in spite of their best efforts to do
 25 so. Parties merely seek to extend discovery for the limited purpose of plaintiff's third party
 26 depositions of John "Halcyon" Styn, Shelter Capital, LLC and Tornante, LCC. All depositions
 27 will be complete by June 7, 2007.

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

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

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

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

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

12 Subsequently, Parties stipulated, and the Court ordered, that the date for exchanging initial
13 disclosures be extended from the Court's original December 15, 2006 deadline to January 16,
14 2007.

15 On April 18, 2007 parties stipulated to extend discovery until May 30, 2007 and on April
16 23, 2007, the Court so ordered.

17 This stipulation and proposed order, if issued, would extend discovery for the limited
18 purpose of plaintiff's third party depositions of John "Halcyon" Styn, Shelter Capital, LLC, and
19 Tornante, LCC. Also the date to file any motion to compel relating to these three depositions
20 would be extended until ten days after the scheduled deposition dates. No other dates would be
21 effected.

22 **WHEREAS** the Court previously set May 30, 2007 as the deadline for fact discovery;

23 **WHEREAS** parties have attempted to meet and confer with regard to scheduling
24 Plaintiff's deposition of John "Halycon" Styn, Shelter Capital, LLC and Tornante, LLC but have
25 been unable to secure a date prior to May 30, 2007 in spite of their best efforts;

26 The parties do therefore stipulate and agree as follows:
27
28

1 1. To extend fact discovery cutoff for the limited purpose of plaintiff’s deposition of
2 John “Halcyon” Styn which is to take place on Thursday May 31, 2007 at 10:00 a.m. in San
3 Diego, California.

4 2. To extend fact discovery cutoff for the limited purpose of plaintiff’s depositions of
5 Shelter Capital, LLC on June 5, 2007 at 1pm, and Tornante, LLC on June 7, 2007 at 2pm, both in
6 Los Angeles, California.

7 3. To extend the deadline for filing any motion to compel relating to the taking of the
8 above referenced depositions until June 22, 2007.

9 4. Counsel for Defendant Veoh Networks is working to coordinate the depositions of
10 the third parties referenced above at the times referenced above.

11 5. This stipulation does not effect due dates of any outstanding discovery requests.

12 **SO STIPULATED.**

13 Dated: 5/29/2007

14 /s/ Gill Sperlein
15 Gill Sperlein
16 THE LAW FIRM OF GILL SPERLEIN
17 Attorney’s for Plaintiff

18 Dated: 5/29/2007

19 /s/ Jennifer A. Golinveaux
20 Jennifer A. Golinveaux
21 WINSTON & STRAWN, LLP
22 Attorney’s for Defendant

23 **[PROPOSED] ORDER**

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: _____

26 _____
27 HONORABLE HOWARD R. LLOYD
28 UNITED STATES MAGISTRATE JUDGE