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15 Attorneys for Plaintiffs,

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

15	IO GROUP, INC., a California corporation,)	CASE NO.: C-10-1282 (MMC)
16	CHANNEL ONE RELEASING, Inc., a)	
17	California corporation and LIBERTY)	STIPULATED REQUEST FOR ORDER
18	MEDIA HOLDINGS, LLC., a California)	CHANGING TIME PURSUANT TO LOCAL
19	corporation,)	RULE 6-2 AND [PROPOSED] ORDER
20	Plaintiffs,)	
21	vs.)	
22	GLBT, Ltd., a British limited company,)	
23	MASH and NEW, Ltd., a British limited)	
24	company, PORT 80, Ltd., a company of)	
25	unknown origin or structure, STEVEN)	
26	JOHN COMPTON, an individual living in)	
27	the United Kingdom, and DAVID)	
28	GRAHAM COMPTON, an individual)	
	living in the United Kingdom.)	
	Defendants.)	

1 All Parties, by and through their respective counsel of record, hereby stipulate to change
2 time for the following reasons:

3 **A. Reasons for Extension of Deadlines**

4 1. The Parties held off on opening formal discovery out of a mutual belief in a high
5 likelihood of settling this matter at the ENE Conference held on November 13, 2010.

6 2. Defense counsel, a sole practitioner, recently returned to England on an emergency basis as
7 his mother suffered a medical emergency.

8 3. Shortly following this, Marc Randazza, attorney for Plaintiffs, was required to study for
9 and sit for the Nevada Bar exam.

10 4. Immediately following this, both Marc Randazza and Gill Sperlein, attended a conference
11 in Washington D.C.

12 5. The Parties have exchanged written discovery requests, and Plaintiffs received Defendants'
13 responses to their first set of requests on March 7, 2011.

14 6. After reviewing these responses, the Plaintiffs believe that there are a number of
15 deficiencies which will require the Parties to meet and confer and may require additional written
16 discovery and/or discovery motions. Additionally, the Parties have not yet been able to set
17 depositions which will require Plaintiffs' counsel to travel to England and/or the Defendants to
18 travel to the United States.

19 **B. Previous Time Modifications**

20 7. Previously the Parties stipulated and the Court allowed an extension of time to complete
21 the ENE conference from October 14, 2010 to November 13, 2010 (ECF No. 32), as well as an
22 extension of discovery deadlines (ECF No. 38).

23 **C Requested Modifications**

24 8. The Parties request a 90-day extension on all deadlines as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cut Off	3/31/11	6/30/11
Experts Named	3/31/11	6/30/11
Rebuttal Experts Named	4/14/11	7/14/11

1	Expert Discovery Cutoff	5/6/11	8/5/11
2	Joint Statement Due	5/6/11	8/5/11
3	Dispositive Motion Due	5/11/11	8/10/11
4	Further Status Conference	5/13/11	8/12/11
5	Meet and Confer	7/5/11	10/3/11
6	PreTrial Conference	8/9/11	11/7/11
7	Trial Date	8/22/11	11/21/11

10 Dated: March 9, 2011

s/ Marc Randazza
 Marc J. Randazza
 Attorney for Plaintiffs

13 Dated: March 9, 2011

s/ Jonathan Capp
 Jonathan Capp
 Attorney for Defendants

16 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

18 Dated: March ____, 2011

 Maxine M. Chesney
 U.S. District Judge

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Certificate of Service

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on March 9, 2011, which automatically sent notice to the Parties' counsel of record.

Dated: March 9, 2011

Respectfully submitted,

s/ Marc Randazza
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