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Attorneys for Defendant
GLOBAL FORCE DIRECT, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AUTODESK, INC.,

Plaintiff,

v.

ZWCAD SOFTWARE CO., LTD., ZWCAD
DESIGN CO., LTD., HK ZWCAD SOFTWARE
LTD., and GLOBAL FORCE DIRECT, LLC
(doing business as ZWCADUSA),

Defendants.

Case No. 14-cv-01409-EJD

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES
PENDING SETTLEMENT
DISCUSSIONS**

1 WHEREAS:

- 2 • Plaintiff Autodesk, Inc. (“Autodesk”) and Defendants ZWCAD Software Co., Ltd.,
- 3 ZWCAD Design Co., Ltd., and HK ZWCAD Software Ltd. (collectively, “ZWSOFT”)
- 4 met in person in San Francisco on July 7, 2015 to discuss potentially resolving this
- 5 action;
- 6 • The July 7, 2015 meeting was productive, and Autodesk and ZWSOFT believe that
- 7 informal factfinding and further discussions may help the parties reach a final
- 8 settlement;
- 9 • The parties anticipate that further formal discovery, including the continued review by
- 10 experts of the parties’ source code, the review and translation of ZWSOFT’s production,
- 11 and the depositions of ZWSOFT’s employees in China, will be quite costly;
- 12 • A 90 day stay of all deadlines in this action will allow Autodesk and ZWSOFT to pursue
- 13 informal factfinding and conduct further discussions relating to a potential settlement,
- 14 which might avoid the costs of formal discovery and promote judicial economy;
- 15 • Any settlement between Autodesk and ZWSOFT likely would address and resolve
- 16 Autodesk’s claims against Defendant Global Force Direct, LLC (doing business as
- 17 “ZwcadUSA”), and
- 18 • The Court has set the following deadlines in the case, but not the trial date:
- 19 Autodesk’s response to ZWSOFT’s Answer (July 10, 2015); fact discovery cutoff
- 20 (September 11, 2015); motions to compel fact discovery (September 18, 2015);
- 21 opening expert reports (October 9, 2015); rebuttal expert reports (October 23, 2015);
- 22 expert discovery cutoff (December 11, 2015); motions to compel expert discovery
- 23 (December 18, 2015); dispositive motions (January 21, 2016); joint trial setting
- 24 conference statement (March 7, 2016); and trial setting conference (March 17, 2016)
- 25 (see Docket Nos. 77 & 119);
- 26
- 27

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that:

1. All deadlines in this action through the January 21, 2016 dispositive motion deadline are extended by 90 days;
2. The deadline for the joint trial setting conference statement (March 7, 2016) and the trial setting conference (March 17, 2016) are taken off calendar;
3. If (i) the parties have not resolved this action within 90 days from the date of this stipulation (*i.e.*, by September 8, 2015) or (ii) any party believes before that date that further settlement discussions are unlikely to be productive and advises the other parties in writing, the parties shall request an immediate status conference with the Court. The conference will be held on the earliest date that the Court is available and address the remainder of the case schedule.

Dated: July 15, 2015

MORRISON & FOERSTER LLP

By: /s/ Richard S.J. Hung

RICHARD S.J. HUNG

Attorneys for Plaintiff AUTODESK, INC.

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Lael D. Andara

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NASSIRI & JUNG LLP

By: /s/ Andrew R. Kislik

Andrew R. Kislik

Attorneys for Defendant
GLOBAL FORCE DIRECT, LLC

IT IS SO ORDERED.

Dated: _____

Edward J. Davila

United States District Court Judge

ATTESTATION OF E-FILED SIGNATURE

I, Richard Hung, am the ECF User whose ID and password are being used to file this Stipulation and Proposed Order Extending Deadlines Pending Settlement Discussions. In compliance with General Order 45, X.B., I hereby attest that Lael Andara and Andrew Kislik have concurred in this filing.

Dated: July 15, 2015

By: /s/ Richard S.J. Hung
RICHARD S.J. HUNG

Attorneys for Plaintiff
AUTODESK, INC.