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Attorneys or Plaintiff and Counter-Defendant
 STARDOCK SYSTEMS, INC. and Counter-
 Defendant VALVE CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STARDOCK SYSTEMS, INC.,

Plaintiff,

v.

PAUL REICHE III and ROBERT
 FREDERICK FORD,

Defendants.

AND RELATED COUNTER-CLAIM.

Case No. 4:17-CV-07025-SBA

**STIPULATION AND [PROPOSED]
 ORDER REGARDING CLOSE OF
 WRITTEN FACT DISCOVERY**

Complaint Filed: December 8, 2017
 Trial Date: March 23, 2020

Plaintiff and Counter-Defendant Stardock Systems, Inc. (“Stardock”) and Counter-
 Defendant Valve Corp. (“Valve”) and Defendants and Counter-Claimants Paul Reiche III and
 Robert Frederick Ford (collectively, “Reiche/Ford”) hereby jointly request and stipulate as
 follows:

1 **WHEREAS**, Stardock and Reiche/Ford have engaged in direct settlement negotiations
2 over the past two weeks and believe they are close to reaching agreement to settle this matter in its
3 entirety.

4 **WHEREAS**, the deadline for Stardock and Valve to respond to requests for admission and
5 interrogatories from Defendants is currently May 24, 2019, and the deadline for Valve to respond
6 to requests for production from Defendants is currently May 29, 2019.

7 **WHEREAS**, the deadline for Reiche/Ford to respond to interrogatories, requests for
8 admission, and requests for production from Stardock and Valve is currently May 29, 2019.

9 **WHEREAS**, on February 14, 2019, the Court issued an Order setting the Close of Written
10 Fact Discovery for May 29, 2019, such that all responses to written discovery are due by that date.

11 **WHEREAS**, Stardock, Valve, and Reiche/Ford wish to delay the aforementioned
12 deadlines to respond to discovery, and the May 29, 2019 Close of Written Fact Discovery, to June
13 3, 2019, to give the parties sufficient time to finalize a settlement agreement if possible.

14 **STARDOCK, VALVE, AND REICHE/FORD HEREBY STIPULATE AS**
15 **FOLLOWS:**

16 1. Stardock's, Valve's, and Reiche/Ford's deadlines to respond to the aforementioned
17 discovery shall be moved from May 24 and 29, 2019, to June 3, 2019.

18 2. The Close of Written Fact Discovery shall be moved from May 29 to June 3, 2019
19 to accommodate the aforementioned extension of discovery deadlines and allow for continued
20 settlement negotiations.

21
22 DATED: May 24, 2019

NIXON PEABODY LLP

23
24 By: /s/ Deanna R. Kunze

25 Deanna R. Kunze
26 Attorneys for Plaintiff and Counter-Defendant
27 STARDOCK SYSTEMS, INC. and Counter-
Defendant VALVE CORPORATION

1 DATED: May 24, 2019

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

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3
4 By: /s/ Stephen C. Steinberg
Stephen C. Steinberg
5 Attorneys for Defendants and Counter-Claimants
6 PAUL REICHE III and ROBERT FREDERICK
7 FORD
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2019

HON. SAUNDRA BROWN ARMSTRONG
UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

I, Stephen C. Steinberg, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER REGARDING CLOSE OF WRITTEN FACT DISCOVERY. Concurrence in and authorization of the filing of this document has been obtained from Deanna R. Kunze, counsel for Stardock and Valve, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

DATED: May 24, 2019

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

By: /s/ Stephen C. Steinberg
Stephen C. Steinberg
Attorneys for Reiche and Ford