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4 **Attorney for Plaintiff**  
5 Open Source Security Inc.

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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 OPEN SOURCE SECURITY INC. ) Case No.: 3:17-cv-04002-LB  
11 Plaintiff, )  
12 v. ) **Stipulated Request for Order Continuing**  
13 BRUCE PERENS, and Does 1-50, ) **Initial Case Management Conference and**  
14 Defendants. ) **ADR Deadlines [and Proposed Order]**  
15 ) Location: Courtroom C, 15th Floor  
16 ) Judge: Hon. Laurel Beeler  
17 ) Trial Date: None Set  
18 )  
19 )

20 The Initial Case Management Conference in this matter is currently set for October 19, 2017.

21 Counsel for Defendant Perens has previous scheduled travel on that date that makes her unable  
22 to attend the conference. Further, Defendant Perens has filed a motion to dismiss and special motion  
23 to strike the complaint pursuant to the California Anti-Slapp Statute, Code Of Civil Procedure Section  
24 425.16, currently set for October 26, 2017, and counsel for both parties agree that continuance of the  
25 Case Management Conference and all currently pending deadlines other than deadlines related to  
26 Defendant’s motions, until a ruling is made on those motions, will permit more efficient case  
27 management, will serve the interests judicial economy, and will conserve Party and Court resources.  
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1 Accordingly, pursuant to Civil Local Rule 6-2(a), the Parties hereby stipulate and  
2 request, through their respective counsel, as follows:

3 (1) the initial Case Management Conference be held on November 30, 2017 at 11:00 AM in  
4 Courtroom C, 15th Floor, Phillip Burton Federal Building 450 Golden Gate Avenue San  
5 Francisco, CA 94102;

6 (2) November 9, 2017, be set as the last day to: (a) meet and confer regarding initial  
7 disclosures, early settlement, ADR process selection, and the discovery plan per Federal Rule  
8 26(f) & ADR L.R. 3-5; (b) file ADR Certification signed by Parties and Counsel per Civil L.R .  
9 16-8(b) & ADR L.R. 3-5(b); and (c) file either Stipulation to ADR Process or Notice of Need  
10 for ADR Phone Conference per Civil L.R . 16-8(c) & ADR L.R. 3-5(b);

11 (3) November 22, 2017, be set as the last day to: (a) file the parties' Joint Case Management  
12 Statement and Rule 26(f) Report; (b) complete Initial Disclosures or state objections to such  
13 disclosures in the Rule 26(f) Report; and (c) file Case Management Statement per Standing  
14 Order regarding Contents of Joint Case Management Statement, according to Federal Rule  
15 26(a) (1) and Civil L.R . 16-9.

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17  
18 Dated: September 21, 2017

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20 CHHABRA LAW FIRM, PC

21 /s/Rohit Chhabra

22 Rohit Chhabra  
23 Attorney for Plaintiff  
24 Open Source Security Inc.

O'MELVENY & MYERS LLP

25 /s/ Melody Drummond Hansen

26 Melody Drummond Hansen  
27 Attorney for Defendant  
28 Bruce Perens

**CASE SCHEDULE – ADR MULTI-OPTION PROGRAM**

<b>Date</b>	<b>Event</b>	<b>Governing Rule</b>
7/17/2017	Complaint Filed	
11/9/2017	Last day to: • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan	FRCivP 26(f) & ADR L.R.3-5
	file ADR Certification signed by Parties and Counsel (form available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	Civil L.R . 16-8(b) & ADR L.R. 3-5(b)
	file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference <a href="http://www.adr.cand.uscourts.gov">http://www.adr.cand.uscourts.gov</a> (form available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	Civil L.R . 16-8(c) & ADR L.R. 3-5(b)
11/22/2017	Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (also available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	FRCivP 26(a) (1) Civil L.R . 16-9
11/30/2017	INITIAL CASE MANAGEMENT CONFERENCE (CMC) at 11:00 AM in: Courtroom C, 15th Floor Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA 94102	Civil L.R . 16-10

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE LAUREL BEELER  
UNITED STATES DISTRICT COURT

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

I, Rohit Chhabra, attest that concurrence in the filing of this Stipulation to Continue the Case Management Conference and Other Pending Deadlines (L.R. 6-2(a)) has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21<sup>st</sup> day of September 2017, at Mountain View, California.

CHHABRA LAW FIRM, PC

/s/Rohit Chhabra

Rohit Chhabra  
Attorney for Plaintiff  
Open Source Security Inc.

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**DECLARATION PURSUANT TO CIVIL LOCAL RULE 6-2(a)**

I, Rohit Chhabra, declare that:

On information and belief, counsel for Defendant Perens has previous scheduled travel on that date that makes her unable to attend the conference. Further, both parties request the court to rule on Defendant Perens motion to dismiss and special motion to strike the complaint pursuant to the California Anti-Slapp Statute, Code Of Civil Procedure Section 425.16, currently set for October 26, 2017, prior to the Case Management Conference and all currently pending deadlines. No previous time modifications have been made in the case. The effect of the continuation on the schedule for the case will be minimal, while permitting more efficient case management, serving the interests judicial economy, and conserve party and Court resources.

I declare under penalty of perjury that the foregoing is true and correct except for those matters stated on information and belief and I believe those matters to be true.

Executed this 22<sup>nd</sup> day of September 2017, at Mountain View, California.

CHHABRA LAW FIRM, PC

/s/Rohit Chhabra

Rohit Chhabra  
Attorney for Plaintiff  
Open Source Security Inc.