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Attorneys for Plaintiffs and Counter-Defendants
NEO4J, INC. and NEO4J SWEDEN AB

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NEO4J, INC., a Delaware corporation, and NEO4J SWEDEN, AB, a Swedish corporation,

Plaintiffs,

v.

PURETHINK LLC, a Delaware limited liability company, IGOV INC., a Virginia corporation, and JOHN MARK SUHY, an individual,

Defendants.

AND RELATED COUNTERCLAIMS.

CASE NO. 5:18-cv-07182-EJD

STIPULATION AND ~~[PROPOSED]~~ ORDER FOR FURTHER MODIFICATION OF PHASE 1 SUMMARY JUDGMENT BRIEFING SCHEDULE

NEO4J, INC., a Delaware corporation, and NEO4J SWEDEN AB, a Swedish corporation,

Plaintiffs,

v.

GRAPH FOUNDATION, INC., an Ohio corporation, GRAPHGRID, INC., an Ohio corporation, and ATOMRAIN INC., a Nevada corporation,

Defendants.

CASE NO. 5:19-cv-06226-EJD

STIPULATION

Plaintiff and Counter-Defendants Neo4j, Inc. and Neo4j Sweden AB (collectively "Plaintiffs"), Defendants and Counterclaimants PureThink LLC and iGov, Inc. and Defendant John Mark Suhy (collectively the "PureThink Defendants") in the action entitled *Neo4j, Inc. et al v. PureThink LLC et al*. Case No. 5:18-cv-07182-EJD ("PT Action") and Defendants Graph Foundation, Inc. ("GFI"), GraphGrid, Inc. and AtomRain Inc. in the related action entitled *Neo4j, Inc. v. Graph Foundation, Inc.*, Case No. 3:19-cv-06226-EJD ("GFI Action"), by and through the parties' respective attorneys, hereby submit this stipulation as follows:

1. On September 10, 2020, the Court entered an order modifying the briefing schedule for the Phase 1 motions for summary judgment. PT Dkt. No. 87; GFI Dkt. No. 77. In that stipulation, the parties agreed that the last day for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions would be February 15, 2021, which the parties did not recognize at that time was a Federal Court Holiday. *Id.*, ¶ 8. Pursuant to Federal Rule of Civil Procedure FRCP 6(a)(1)(C), Plaintiffs' brief is actually due on February 16, 2021.

2. In the interest of caution and for clarity, the parties agreed to submit this stipulation confirming the deadline for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions is February 16, 2021.

3. The parties further agree that the last day for Defendants to file their combined reply brief in the PureThink and GFI Action shall be moved from March 8, 2021 to March 9, 2021 to offset the foregoing adjustment.

Event	**Current Date**	**Proposed Date**
Last Day for Plaintiffs to file their combined opposition/reply in the PT Action and GFI Action	February 15, 2021	February 16, 2021
Last Day for Defendants to file their combined reply brief in the PT Action and GFI Action	March 8, 2021	March 9, 2021
Hearing on motions for summary judgment, partial summary judgment and/or summary adjudication and a further Case Management Conference to set the schedule for Phase 2 in the PT Action and GFI Action	April 15, 2021. *See* PT Dkt. No. 105; GFI Dkt. No. 104.	No Change.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: February 1, 2021

HOPKINS & CARLEY
A Law Corporation

By: */s/ Jeffrey M. Ratinoff*
Jeffrey M. Ratinoff
Attorneys for Plaintiffs NEO4J, INC. and NEO4J SWEDEN AB

Dated: February 1, 2021

/s/ Adron W. Beene
Adron W. Beene
Attorneys for Defendants PURETHINK LLC, IGOV INC., and JOHN MARK SUHY

Dated: February 1, 2021

BERGESON, LLP

By: */s/ John D. Pernick*
John D. Pernick
Attorneys for Defendant GRAPH FOUNDATION, INC.

Dated: February 1, 2021

SKAGGS FAUCETTE LLP

By: */s/ Jeffrey E. Faucette*
Jeffrey E. Faucette
Attorneys for Defendants GRAPHGRID, INC. and ATOMRAIN INC.

IT IS SO ORDERED.

Dated: February 2, 2021

EDWARD J. DAVILA
United States District Court Judge

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a "conformed" signature (/s/) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: February 1, 2021

HOPKINS & CARLEY
A Law Corporation

By: */s/ Jeffrey M. Ratinoff*
John V. Picone III
Jeffrey M. Ratinoff
Attorneys for Plaintiffs and
Counter-Defendants
NEO4J, INC. and NEO4J SWEDEN AB