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Attorneys for defendants and counterclaimants:  
PURETHINK LLC, a Delaware limited  
liability company, IGOV INC., a Virginia  
corporation, and JOHN MARK SUHY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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

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 MODIFICATION OF  
BRIEFING SCHEDULE ON MOTION FOR  
JUDGMENT ON THE PLEADINGS**

Hearing Date: January 13, 2022  
Time 9:00 a.m.  
Courtroom 4, 5<sup>th</sup> floor  
Judge: Edward J. Davila

**STIPULATION**

This Stipulation is made pursuant to Civil L.R. 6-2 and between Plaintiffs and Counter-Defendants Neo4j, Inc. and Neo4j Sweden AB (collectively “Plaintiffs”) and Defendants and Counterclaimants PureThink LLC, iGov Inc. and John Mark Suhy (collectively, “Defendants”) through their respective attorneys. Plaintiffs and Defendants (collectively, the “Parties”) stipulate to the following modifications to the briefing schedule on Motion for Judgment on the Pleadings Re: Defendants' Second Amended Counterclaims and Answer to Third Amended Complaint; Memorandum of Points and Authorities in Support Thereof filed by Neo4j Sweden AB, Neo4j, Inc. Motion Hearing set for January 13, 2022, 09:00 AM before the Honorable Edward J. Davila (Dkt. No. 132) and for good cause showing as follows:

1. Plaintiffs filed their motion for Judgment on the Pleadings Re: Defendants' Second Amended Counterclaims and Answer to Third Amended Complaint on September 3, 2021.

2. Defendants’ opposition is presently due September 17, 2021.

3. Plaintiffs’ reply is presently due September 24, 2021.

4. Defendants have requested an agreement to have more time to file their response to the motion with more time for Plaintiffs’ to file their reply to the motion as well.

5. The Parties agree that the deadline to file Defendants’ opposition shall now be September 27, 2021 and the deadline to file Plaintiffs’ reply shall now be October 12, 2021.

6. The Parties agree the Motion for Judgment on the Pleadings may be submitted on the papers without oral argument.

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The Parties agree to the following change in the briefing schedule on the Motion for Judgment on the Pleadings:

Event	Current Deadline	Proposed New Deadline
Opposition to motion due	September 17, 2021	September 27, 2021
Reply to motion due	September 24, 2021	October 12, 2021

The Parties further consent to the Court taking the Motion under submission without oral argument once the motion is fully briefed by the Parties.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Dated: September 14, 2021

HOPKINS & CARLEY  
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

John V. Picone III  
Jeffrey M. Ratinoff  
Cary Chien  
Attorneys for Plaintiffs and  
Counter-Defendants  
NEO4J, INC. and NEO4J SWEDEN AB

Dated: September 14, 2021

/s/ Adron G. Beene

Adron W. Beene  
Adron G. Beene  
Attorneys for Defendants and Counter-  
Claimants  
PURETHINK LLC, IGOV INC., and  
JOHN MARK SUHY

**IT IS SO ORDERED.**

Dated: September 14, 2021



EDWARD J. DAVILA  
United States District Court Judge