

1 Adron W. Beene SB# 129040
2 Adron G. Beene SB# 298088
3 Attorney at Law
4 7960 Soquel Drive, suite B#296
5 Aptos, CA 95003
6 Tel: (408) 392-9233
7
8 adron@adronlaw.com

9
10 Attorneys for defendants and counterclaimants:
11 PURETHINK LLC, a Delaware limited
12 liability company, IGOV INC., a Virginia
13 corporation, and JOHN MARK SUHY

14
15
16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA

19
20 NEO4J, INC., a Delaware corporation,
21 NEO4J SWEDEN, AB,

22 Plaintiffs,
23
24 v.

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

Defendants.

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, 5th floor
Judge: Edward J. Davila

29
30 AND RELATED COUNTERCLAIMS.

31

32

33

34

35

36

37

38

STIPULATION

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

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

13 ||| 2. Defendants' opposition is presently due September 17, 2021.

14 || 3. Plaintiffs' reply is presently due September 24, 2021.

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

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

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

21 //

22 //

23 //

24 //

25 //

26 //

27 //

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

4 Event	5 Current Deadline	6 Proposed New Deadline
Opposition to motion due	September 17, 2021	September 27, 2021
Reply to motion due	September 24, 2021	October 12, 2021

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

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

10 Dated: September 14, 2021

HOPKINS & CARLEY
 A Law Corporation

11 By: /s/ Jeffrey M. Ratinoff

12 John V. Picone III
 13 Jeffrey M. Ratinoff
 14 Cary Chien
 15 Attorneys for Plaintiffs and
 16 Counter-Defendants
 17 NEO4J, INC. and NEO4J SWEDEN AB

18 Dated: September 14, 2021

19 /s/ Adron G. Beene

20 Adron W. Beene
 21 Adron G. Beene
 22 Attorneys for Defendants and Counter-
 23 Claimants
 24 PURETHINK LLC, IGOV INC., and
 25 JOHN MARK SUHY

26 **IT IS SO ORDERED.**

27 Dated: September 14, 2021

28 
 29 EDWARD J. DAVILA
 30 United States District Court Judge