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NEO4J, INC., NEO4J SWEDEN AB

13 NEO4J, INC., a Delaware corporation,
14 NEO4J SWEDEN AB, a Swedish
corporation,

15 Plaintiffs,

16 || v.

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

Defendants.

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

**JOINT STIPULATION FOR LEAVE TO
FILE PLAINTIFF AND COUNTER-
DEFENDANT'S FIRST AMENDED
ANSWER**

21 || AND RELATED COUNTERCLAIM.

22 Plaintiffs Neo4j, Inc. and Neo4j Sweden AB (collectively “Plaintiffs/Counter-
23 Defendants”) and Defendants PureThink LLC, iGov Inc., and John Mark Suhy (collectively
24 “Defendants”) submit the following Joint Stipulation and request that the Court grant
25 Plaintiffs/Counter-Defendants leave to file its Amended Answer attached hereto as **Exhibit A**
26 pursuant to Rule 15(a) of the Federal Rules of Civil Procedure:

WHEREAS, Defendants PureThink LLC and iGov Inc. filed their Counterclaim in this

1 action against Neo4j, Inc. on January 9, 2019 (Dkt. No. 22);

2 WHEREAS, Neo4j, Inc. filed its Answer to the Counterclaim on February 21, 2019 (Dkt.
3 No. 30);

4 WHEREAS, the deadline to file amended pleadings to add parties, claims and
5 counterclaims in the above-entitled action is currently October 30, 2019 (Dkt. No. 32);

6 WHEREAS, it is unclear whether this deadline also extends to amendments to a party's
7 answer;

8 WHEREAS, out of an abundance of caution, Plaintiffs/Counter-Defendants seek to file its
9 Amended Answer to add an additional affirmative defense; and

10 WHEREAS a copy of Plaintiffs/Counter-Defendants' proposed Amended Answer is
11 attached hereto as Exhibit A.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto
13 through their respective attorneys of record Plaintiffs/Counter-Defendants may, pursuant to
14 Federal Rule of Civil Procedure 15(a), file an amended answer in the form attached hereto as
15 Exhibit A;

16 Dated: October 30, 2019

HOPKINS & CARLEY
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18 By: /s/ Jeffrey M. Ratinoff

19 Jeffrey M. Ratinoff
20 Attorneys for Plaintiff and Counter-
Defendant NEO4J, INC.

22 Dated: October 30, 2019

By: /s/ Adron W. Beene

23 Adron W. Beene
24 Adron G. Beene
25 Attorneys for Defendants and
Counterclaimants PURETHINK LLC,
IGOV INC., and JOHN MARK SUHY

26 PURSUANT TO STIPULATION, IT IS SO ORDERED.

27 Dated: _____

28 Hon. Edward J. Davila
U.S. DISTRICT COURT JUDGE

FILER'S ATTESTATION

I, Jeffrey M. Ratinoff, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with N.D. Cal. Civil Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

Dated: October 30, 2019

HOPKINS & CARLEY
A Law Corporation

By: /s/ *Jeffrey M. Ratinoff*

Jeffrey M. Ratinoff
Attorneys for Plaintiff and Counter-
Defendant NEO4J, INC.