Jennifer Seraphine (Cal Bar. No. 245463)
seraphine@turnerboyd.com
TURNER BOYD LLP
702 Marshall Street
Suite 640
Redwood City, California 94063
Telephone: (650) 521-5930
Facsimile: (650) 521-5931

Todd M. Malynn (Cal. Bar No. 181595)
tmalynn@feldmangale.com
FELDMAN GALE, P.A.
Promenade West
880 W 1st Street, #315
Los Angeles, California 90012
Telephone: (213) 625-5992
Facsimile: (213) 625-5993

Attorneys for Plaintiff

Karl S. Kronenberger (Cal. Bar No. 226112)
Jeffrey M. Rosenfeld (Cal. Bar No. 222187)
KRONENBERGER ROSENFELD, LLP
150 Post Street, Suite 520
San Francisco, California 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
karl@KRInternetLaw.com
Jeff@KRInternetLaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RIPPLE LABS, INC.,
F/K/A OPENCOIN, INC.,
A CALIFORNIA CORPORATION,

Plaintiff,

vs.

LACORE ENTERPRISES, LLC,
A TEXAS LIMITED LIABILITY
COMPANY;
RIPPLN, INC., A TEXAS
CORPORATION; AND
TERRY LACORE, AN INDIVIDUAL,

Defendants.

Case No. 13-cv-5974

STIPULATION REGARDING DEADLINE FOR DEFENDANTS TO RESPOND TO COMPLAINT AND BRIEFING AND HEARING SCHEDULE FOR PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Local Rule 6-2, Plaintiff Ripple Labs, Inc. and Defendants LaCore Enterprises, LLC, Rippln, Inc., and Terry LaCore (collectively, the "Parties"), hereby respectfully request by Stipulation that the Court extend the time for Defendants to respond to Plaintiff's Complaint (D.E. 1) and extend the briefing schedule and hearing on Plaintiff's motion for preliminary injunction (D.E. 4).

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiff filed its Complaint and Motion for Preliminary Injunction, and supporting papers, on December 27, 2013. Defendants previously filed an Unopposed Motion to Extend the Deadline for Defendants to Respond to Complaint and Briefing and Hearing Schedule for Plaintiff's Motion for Preliminary Injunction (D.E. 14). The Court granted that motion (D.E. 16), and the current schedule calls for Defendants to respond to the Complaint and file their opposition to Plaintiff's preliminary injunction motion on February 6, for Plaintiff to file its reply in support of the preliminary injunction motion on February 13, and sets the hearing on Plaintiff's preliminary injunction motion for February 20.

The Parties have entered into discussions that may resolve or limit the issues that need to be presented to the Court in this matter, and request a brief extension of these deadlines to continue those discussions. Specifically, the Parties request a one-week extension of the deadline for Defendant to respond to the Complaint and the briefing schedule on the preliminary injunction motion, and a two-week extension of the hearing date on that motion:

February 13	Defendants to respond to Complaint (D.E. 1)
February 13	Defendants to file opposition to preliminary injunction motion (D.E. 4)
February 20	Plaintiff to file reply in support of preliminary injunction motion (D.E. 4)
March 6	Hearing on Motion for Preliminary Injunction (D.E. 4)

The Parties agree that Plaintiff does not and will not waive any rights or make any concessions regarding the seriousness or immediacy of its preliminary injunction motion and that Defendants will make no arguments to the contrary based on Plaintiff's stipulation to the extension of these deadlines.

For the reasons set forth herein, the Parties respectfully request that the Court extend the deadlines on extend the time for Defendants to respond to Plaintiff's Complaint and extend the briefing schedule and hearing on Plaintiff's motion for preliminary injunction as set forth herein.

Respectfully submitted,

By: *Jennifer Seraphine*
Jennifer Seraphine (Cal Bar. No. 245463)

Attorney for Plaintiff

By: *Karl S. Kronenberger*
Karl S. Kronenberger (Cal. Bar No. 226112)

Attorney for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 1/30/14

Honorable Richard Seeborg
United States District Judge