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9 Counsel for Defendant  
10 Everlight Americas, Inc.

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12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14 DOCUMENT SECURITY  
15 SYSTEMS, INC.,

16 Plaintiff,

17 vs.

18 EVERLIGHT ELECTRONICS CO.,  
19 LTD., AND EVERLIGHT  
20 AMERICAS, INC.,

21 Defendants.

Case No.: 2:17-cv-04273-PSG

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT EVERLIGHT  
AMERICAS, INC. TO RESPOND TO  
COMPLAINT AND [PROPOSED]  
ORDER THEREON**

Hon. Philip S. Gutierrez

Complaint served: June 8, 2017  
Current response date: July 11, 2017  
New response date: September 12, 2017

1 IT IS HEREBY STIPULATED by and between the Parties, through their  
2 respective attorneys of record, as follows:

3 WHEREAS, on June 8, 2017, Plaintiff, Document Security Systems, Inc.  
4 (“Plaintiff”) filed its Complaint;

5 WHEREAS, on or about June 20, 2017, Plaintiff served the Complaint and  
6 Summons on Defendant Everlight Americas, Inc., a Delaware corporation  
7 (“Everlight Americas”), such that Everlight Americas’ response to the Complaint  
8 is due on July 11, 2017;

9 WHEREAS, Defendant Everlight Electronics Co., a Taiwanese corporation  
10 (“Everlight Electronics”), has not yet been served in the case;

11 WHEREAS, Plaintiff desires to expedite service on Everlight Electronics  
12 rather than use the procedures provided for service under the Hague Convention;

13 WHEREAS, the Parties desire to coordinate the timing of a response to the  
14 Complaint by both Everlight Electronics and Everlight Americas;

15 WHEREAS, to promote efficiency, Everlight Electronics has agreed to  
16 accept service without requiring Plaintiff to comply with the provisions of service  
17 under the Hague Convention if the Court approves a deadline of September 12,  
18 2017 for both Defendants to respond to the Complaint;

19 WHEREAS Everlight Americas has recently retained local counsel in this  
20 case in order to obtain an extension of time in which to respond to the Complaint;

21 WHEREAS Plaintiff recognizes that Everlight Electronics and Everlight  
22 Americas will require sufficient time to prepare a response to the Complaint due  
23 to the need to translate documents and communicate with individuals located in  
24 Taiwan;

25 NOW, THEREFORE, the Parties stipulate to the following extension, as  
26 stated in the attached [Proposed] Order, subject to the approval of the Court:  
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