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15 Counsel for Defendants
16 Everlight Electronics Co. and
17 Everlight Americas, Inc.

18
19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

21 DOCUMENT SECURITY
22 SYSTEMS, INC.,

23 Plaintiff,

24 vs.

25 EVERLIGHT ELECTRONICS CO.,
26 LTD., AND EVERLIGHT
27 AMERICAS, INC.,

28 Defendants.

Case No.: 2:17-cv-04273-JVS-JCG

**STIPULATION FOR SECOND
EXTENSION OF TIME TO RESPOND
TO COMPLAINT; [PROPOSED]
ORDER THEREON**

Hon. James V. Selna

[Proposed] Order Filed Herewith]

1 Plaintiff Document Security Systems, Inc. (“Plaintiff”) and Defendant
2 Everlight Americas, Inc., a Delaware corporation (“Everlight Americas”) and
3 Everlight Electronics Co., Ltd., a Taiwanese corporation (“Everlight Electronics”)
4 (collectively “Defendants”) hereby stipulate pursuant to Fed. R. Civ. P. 15(a)(2)
5 as follows:

6 WHEREAS, in response to Plaintiffs’ Complaint, Defendants intended to
7 file a motion to dismiss, including at least to dismiss certain of the claims asserted
8 therein under Fed. R. Civ. P. 12(b)(6);

9 WHEREAS, consistent with their obligations under Local Rule 7-3, counsel
10 for Defendants and for Plaintiff met and conferred in good faith on September 5,
11 2017;

12 WHEREAS, after the Parties’ good faith efforts to meet and confer,
13 Plaintiff confirmed on September 6, 2017, that it intended to file a First Amended
14 Complaint;

15 WHEREAS, Plaintiff offered, and the Parties have agreed that Defendants
16 should have a two-week extension of the current date for Defendants’ to respond
17 to the Complaint—from September 12, 2017 to September 26, 2017—because
18 Plaintiff anticipates filing an amended complaint sometime during that period that
19 would supersede the current Complaint and set a new deadline for a responsive
20 pleading.
21

22 WHEREAS, the Parties respectfully submit that good cause exists for the
23 relief proposed in this Stipulation in order to foster judicial economy and judicial
24 efficiency;

25 NOW THEREFORE, the Parties herein stipulate, and request that the Court
26 order, that Defendants shall have until **September 26, 2017** to respond to the
27 Complaint.
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IT IS SO STIPULATED.

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Dated: September 7, 2017

RUSS AUGUST & KABAT

By: /s/ Brian Ledahl (with permission)

Brian Ledahl
Attorneys for Plaintiff
Document Security Systems, Inc.

Dated: September 7, 2017

DAVIDSON LAW GROUP, ALC

By: /s/ Ben M. Davidson

Ben M. Davidson
Counsel for Defendant
Everlight Americas, Inc.
and Everlight Electronics Co., Ltd.

ATTESTATION OF AUTHORIZATION

Pursuant to Section 2(f)(4) of the electronic case filing administrative policies and procedures manual, I hereby certify that the content of this document is acceptable to Brian Ledahl, counsel for Plaintiff, and I have obtained his authorization to affix his electronic signature to this document

/s/ Ben M. Davidson

Ben M. Davidson