

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COINLAB, INC., a Delaware Corporation,

Plaintiff,

v.

MT. GOX KK, a Japanese corporation, and
TIBANNE KK, a Japanese corporation,

Defendants.

No. 2:13-cv-00777-MJP

**STIPULATION AND ORDER
EXTENDING DATE FOR SUBMISSION
OF JOINT STATUS REPORT AND
DISCOVERY PLAN AND RELATED
FRCP 26 DATES**

**NOTE ON MOTION CALENDAR:
Friday, August 30, 2013**

I. STIPULATION

The parties, by and through their counsel of record, stipulate to a 20 day extension for their submission of the Joint Status Report and Discovery Plan from September 20, 2013 to October 10, 2013, and a corresponding extension to other FRCP 26 related deadlines as follows:

Deadline for FRCP 26(f) Conference	September 26, 2013
Initial Disclosures Pursuant to FRCP 26(a)(1)	October 3, 2013
Combined Joint Status Report and Discovery Plan	October 10, 2013

The parties have stipulated to an extension of these dates for the reasons set forth below.

The complaint in this action was filed on May 2, 2013 (Doc. No. 1). The two named defendants, Mt. Gox Co., Ltd. ("Mt Gox") and Tibanne Co., Ltd. ("Tibanne") are each Japanese corporations and are located in Japan.

On June 3, 2013, this Court issued its initial Order Regarding Initial Disclosures, Joint Status Report and Early Settlement (Doc. No. 7), which set July 1, July 8, and July 15, 2013, as the respective deadlines for the FRCP 26(f) conference, the FRCP 26(a)(1) Initial Disclosures, and the submission date for the Joint Status Report. On June 5, 2013, the plaintiff requested and the Court granted an extension of time to file the Joint Status Report to September 20, 2013, and adjusted all other FRCP 26 related deadlines accordingly (that is, September 6 and 13 for, respectively, the FRCP 26(f) conference and the FRCP 26(a)(1) Initial Disclosures)(Dkt. No. 8).

Service of the summons and complaint was effected on defendant Tibanne on or about August 5, 2013 and on defendant Mt. Gox on or about August 16, 2013. The responses

1 to the complaint of each of these defendants are to filed and served on or before September
2 10, 2013. In light of the facts that (1) service of process had just been completed, and
3 (2) both defendants are Japanese corporations with their place of business in Japan,
4 defendants requested an extension of the current deadlines for, respectively, the FRCP 26(f)
5 conference, the FRCP 26(a)(1) Initial Disclosures, and the submission of the Joint Status
6 Report. On August 29, 2013, counsel for the parties agreed to extend each of such dates for
7 20 days as such would make for a meaningful FRCP 26(f) conference and the preparation of
8 initial disclosures.
9
10

11 RESPECTFULLY SUBMITTED this 30th day of August, 2013.

12 BRESKIN JOHNSON & TOWNSEND PLLC

13 By s/ Roger M. Townsend

14 Roger M. Townsend, WSBA No. 25525
15 Breskin Johnson & Townsend PLLC
16 1111 Third Avenue, Suite 2230
17 Seattle, WA 98101
18 Phone: (206) 652-8660
19 Fax: (206) 652-8290
20 Email: rtownsend@bjtlegal.com

21 SUSMAN GODFREY LLP

22 Edgar Sargent, WSBA No. 28283
23 Floyd Short, WSBA No. 21632
24 Lindsey Godfrey Eccles, WSBA No. 33566
25 Susman Godfrey LLP
26 1201 3rd Ave Ste 3800
27 Seattle, WA 98101-3087
28 esargent@susmangodfrey.com
fshort@susmangodfrey.com
leccles@susmangodfrey.com
Phone: (206) 516-3895
Fax: (206) 516-3883

Attorneys for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

HILLIS CLARK MARTIN & PETERSON P.S.

By s/ Louis D. Peterson
Louis D. Peterson, WSBA #5776
Joseph B. Genster, WSBA #14968
Hillis Clark Martin & Peterson P.S.
1221 Second Avenue, Suite 500
Seattle WA 98101-2925
Telephone: (206) 623-1745
Facsimile: (206) 623-7789
Email: ldp@hcmp.com; jbg@hcmp.com

BAKER & MCKENZIE LLP
(Admitted *pro hac vice*)
Tod L. Gamlen
Daniel G. Valles
Baker & McKenzie LLP
660 Hansen Way
Palo Alto, CA 94304
Telephone: (650) 856-2400
Facsimile: (650) 856-9299
Email: Tod.Gamlen@bakermckenzie.com;
daniel.valles@bakermckenzie.com
Attorneys for Defendants

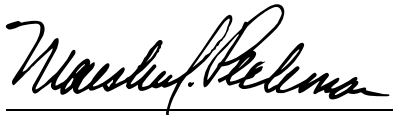
II. ORDER

Based on the foregoing stipulation of the parties, the dates for initial disclosures and submission of the Joint Status Report and Discovery Plan are extended as follows:

Deadline for FRCP 26(f) Conference	September 26, 2013
Initial Disclosures Pursuant to FRCP 26(a)(1)	October 3, 2013
Combined Joint Status Report and Discovery Plan	October 10, 2013

IT IS SO ORDERED.

DONE THIS 9th day of September, 2013.



Marsha J. Pechman
Chief United States District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28