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8 Attorneys for Defendants Code Rebel,
 LLC, Arben Kryeziu and Volodymyr Bykov
 9 sued erroneously as Vladimir Bickov

10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**

13 AQUA CONNECT, a Nevada
 14 Corporation,

15 Plaintiff,

16 vs.

17
 18 CODE REBEL, LLC, a Hawaii
 Limited Liability Company; ARBEN
 19 KRYEZIU, an individual;
 VLADIMIR BICKOV, an individual;
 20 and DOES 1 through 10, inclusive,

21 Defendants
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CASE NO. CV11-5764 RSWL (MANx)

**JOINT STIPULATION TO EXTEND
 DISCOVERY DEADLINE**

1 IT IS HEREBY STIPULATED and requested by and between the attorneys
2 for Plaintiff Aqua Connect and Defendants Code Rebel, LLC, Arben Kryeziu and
3 Volodymyr Bykov, that the fact discovery deadline, and no other deadlines set in
4 this case, be extended by two months, from January 11, 2013 to March 11, 2013.

5 The parties are requesting this extension in an attempt to ensure that the
6 remaining outstanding discovery is completed in a timely manner without placing
7 an undue burden on the ongoing businesses of the respective parties. In particular,
8 there are a few additional depositions to be held, a third party deposition to be held,
9 a computer inspection to be completed, and a few sets of outstanding written
10 discovery. Given the upcoming holidays and some unforeseen burdens on some
11 principle witnesses, the parties seek additional time to schedule the remaining
12 discovery events in a way that will not place an undue burden on any party, and
13 also not negatively impact the other deadlines set in this case.

14 Since the expert discovery deadline in this case is set for May 10, 2013, and
15 the trial set for August 13, 2013, the parties believe that the requested extension of
16 the discovery cut-off will not impact or require the alteration of any of the other
17 dates currently set in this case.

18 This is the first extension requested by the parties in this case, by stipulation
19 or otherwise, and the parties are not requesting that any other deadlines or dates in
20 this case be extended or otherwise changed.

21 In view of the foregoing, it is respectfully requested that the Court grant the
22 parties' request to extend the fact discovery deadline from January 11, 2013 to
23 March 11, 2013.

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26 Dated: December 7, 2012 By: /s/ Michael K. Hagemann
27 Michael K. Hagemann
28 Attorney for Plaintiff Aqua Connect

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Dated: December 7, 2012

By: /s/ John M. Houkom
JOHN M. HOUKOM
Quintana Law Group APC
Attorney for Defendants Arben Kryeziu,
Code Rebel, LLC and Volodymyr
Bykov, sued erroneously as Vladimir
Bickov

(Electronically signed by Michael K.
Hagemann with the e-mail permission of
John M. Houkom L.R. 5-4.3.4(a)(2)(i).)