THE HONORABLE JAMES L. ROBART 1 2 3 4 5 6 7 8 9 UNITED STATES DISTRICT COURT 10 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 11 CLOANTO CORPORATION, a Nevada 12 Corporation No. 2:18-cv-00535-JLR 13 Plaintiff, 14 STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES vs. 15 HYPERION ENTERTAINMENT C.V.B.A., **Note for Motion Calendar:** 16 May 18, 2018 17 Defendant. 18 19 20 21 22 23 24 25 26 STIPULATED MOTION TO EXTEND INITIAL LEE & HAYES, PLLC SCHEDULING DATES 701 Pike Street, Suite 1600 Seattle, WA 98101 CASE No. 2:18-cv-00535

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Case 2:18-cv-00535-JLR Document 27 Filed 05/18/18 Page 2 of 4

Plaintiff Cloanto Corporation ("Cloanto") and Defendant Hyperion Entertainment C.V.B.A. ("Hyperion"), pursuant to LCR 7(d)(1) and LCR 10(g), jointly move the Court for an Order extending, by approximately four weeks, the Initial Scheduling Dates set forth in the Court's "Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Doc. 23). Proposed new dates are set forth below.

Cloanto and Hyperion jointly advise the Court that good cause exists to grant the requested extension. Counsel for both parties, some of whom are located on the East Coast, will be in Seattle the week of May 21 for the Annual Meeting of the International Trademark Association (INTA), and have made plans for a face-to-face meeting to discuss potential resolution of the dispute.

Cloanto and Hyperion further advise the Court that their counsel have met and conferred as provided by LCR 42(b) regarding the possible severance or consolidation of claims brought by Hyperion in Civil Action No. 2:18-cv-00381-RSM, *Hyperion Entertainment C.V.B.A v. Itec, LLC; Amiga, Inc.; Amino Devel. Corp. and Cloanto Corporation*, filed March 13, 2018. Extension of case deadlines in this matter will facilitate further conference with the defendants who have not yet appeared in that action.

Thus, for the reasons set forth above, Hyperion and Cloanto move that the Court extend the Initial Scheduling Dates in this matter as follows:

Deadline for FRCP 26(f) Conference: 6/14/2018

Initial Disclosures Pursuant to FRCP 26(a)(1) 6/28/2018

Combined Joint Status Report and Discovery

Plan as Required by FRCP 26(f)

STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES - 1 CASE No. 2:18-cv-00535

And Local Civil Rule 26(f)

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7/6/2018

Case 2:18-cv-00535-JLR Document 27 Filed 05/18/18 Page 3 of 4

1	Respectfully submitted this <u>18th</u> day of May, 2018.
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3	By: s/Robert J. Carlson
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16	Email: mike@atkinsip.com
17	Attorneys for Plaintiff Cloanto Corporation
18	
19	SO ORDERED:
20	DATED this 215 th day of May, 2018.
21	Jun L Rlet
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23	HONORABLE JAMES L. ROBART UNITED STATES DISTRICT JUDGE
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	STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES - 2 CASE No. 2:18-cv-00535 LEE & HAYES, PLLC 701 Pike Street, Suite 1600 Seattle, WA 98101 (206) 315-4001 Telephone (206) 315-4004 Fax

CERTIFICATE OF SERVICE

I certify that on the <u>18th</u> day of May, 2018, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record for the Parties in the above-captioned matter.

s/ Robert J. Carlson

Robert J. Carlson, WSBA 18455

STIPULATED MOTION TO EXTEND INITIAL SCHEDULING DATES - 3 CASE No. 2:18-cv-00535

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