

1 COOLEY LLP
MICHAEL G. RHODES (116127) (rhodesmg@cooley.com)
2 PATRICK P. GUNN (172258) (pgunn@cooley.com)
DYLAN R. HALE (240898) (dhale@cooley.com)
3 RAY A. SARDO (245421) (rsardo@cooley.com)
101 California Street, 5th Floor
4 San Francisco, CA 94111-5800
Telephone: (415) 693-2000
5 Facsimile: (415) 693-2222

6 Attorneys for Defendants
WILLIAM R. HOLLIDAY, an Individual; HOLLIDAY IT
7 SERVICES, INC., a California corporation

8
9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

13 INTERNET BRANDS, INC., a Delaware
corporation,

14 Plaintiff,

15 v.

16 WILLIAM RYAN HOLLIDAY, an
17 Individual; HOLLIDAY IT SERVICES,
INC., a California corporation; and JAMES
18 HEILMAN, an individual; and DOES 1-10,
inclusive,

19 Defendants.
20
21

Case No. cv12-8088-SVW(RZx)

**JOINT STIPULATION TO CONTINUE
HEARING DATE ON DEFENDANTS'
SPECIAL MOTION TO STRIKE AND
MOTION TO DISMISS**

Date: November 5, 2012
Time: 1:30 p.m.
Judge: Stephen V. Wilson
Courtroom: 6

Trial Date: Not yet set

1 This Stipulation is entered into by and among plaintiff Internet Brands, Inc. (“Plaintiff” or
2 “IB”) and defendants William Ryan Holliday and Holliday IT Services, Inc. (“Defendants”)
3 (collectively “the Parties”), by and through their respective counsel.

4 WHEREAS, Defendants removed the above-entitled action to the United States District
5 Court for the Central District of California on September 19, 2012;

6 WHEREAS, Defendants filed a Special Motion to Strike and Motion to Dismiss
7 Plaintiff’s Complaint on September 26, 2012 (ECF No. 6);

8 WHEREAS, Defendants’ Special Motion to Strike and Motion to Dismiss is scheduled
9 for hearing on November 5, 2012;

10 WHEREAS, Defendants’ Special Motion to Strike and Motion to Dismiss has been fully
11 briefed by both Parties;

12 WHEREAS, the Parties have been engaged in ongoing and diligent settlement
13 negotiations, and recent progress in those settlement negotiations leads the Parties to reasonably
14 believe that further discussion may lead to a final out-of-court settlement that would obviate the
15 need for a hearing;

16 WHEREAS, the Parties have conferred and agree that a short continuation of the
17 November 5, 2012 hearing date is necessary to further such discussions;

18 NOW, THEREFORE, the Parties hereby stipulate and agree that the hearing date on
19 Defendants’ Special Motion to Strike and Motion to Dismiss should be continued for a short
20 period of time, and respectfully request that said hearing be continued to November 19, 2012.

21 **IT IS SO STIPULATED.**

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

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

Dated: November 2, 2012

COOLEY LLP
MICHAEL G. RHODES (116127)
PATRICK P. GUNN (172258)
DYLAN R. HALE (240898)
RAY A. SARDO (245421)

/s/ Ray A. Sardo
Ray A. Sardo (SBN 245421)
Attorneys for Defendants
WILLIAM RYAN HOLLIDAY AND
HOLLIDAY IT SERVICES, INC.

Dated: November 2, 2012

WENDY E. GIBERTI (SBN 268933)

/s/ Wendy E. Giberti
Wendy E. Giberti (SBN 268933)
Attorney for Plaintiff
INTERNET BRANDS, INC.

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

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-4.3.1

I, Ray Sardo, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: November 2, 2012

/s/ Ray A. Sardo
Ray A. Sardo