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**Attorney for Plaintiffs**  
Open Source Security Inc. &  
Bradley Spengler

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

OPEN SOURCE SECURITY INC. and  
BRADLEY SPENGLER

Plaintiff,

v.

BRUCE PERENS, and Does 1-50,

Defendants.

Case No.: 3:17-cv-04002-LB

**STIPULATED REQUEST TO SET  
REVISED SCHEDULE FOR  
PROCEEDINGS ON MOTION FOR  
ATTORNEYS' FEES AND MOTION  
FOR SANCTIONS; DECLARATION  
OF ROHIT CHHABRA IN SUPPORT  
THEREOF; [PROPOSED] ORDER**

Location: Courtroom C, 15th Floor  
Judge: Hon. Laurel Beeler

3:17-CV-04002-LB

Stipulated Request To Set Revised Schedule

Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, and subject to the Court's approval, Plaintiffs Open Source Security, Inc. and Bradley Spengler, and Defendant Bruce Perens hereby stipulate to the following revised dates and deadlines relating to Defendant's pending motion for attorneys' fees (ECF No. 62) and motion for sanctions<sup>1</sup> (ECF No. 64):

Event	Stipulated Date
Plaintiff's opposition to motion for attorneys' fees	<b>March 8, 2018</b> (Currently February 21, 2018)
Plaintiff's counsel's response to motion for attorneys' fees (subject to Court's determination of Plaintiffs' counsel's ex parte motion (ECF No. 68)).	<b>March 8, 2018</b> (Currently February 22, 2018)
Defendant's reply in support of motion for attorneys' fees	<b>March 22, 2018</b> (Currently February 28, 2018)
Defendant's reply in support of motion for sanctions	<b>March 22, 2018</b> (Currently March 1, 2018)
<b>Combined hearing</b> on Defendant's motion for attorneys' fees and motion for sanctions	<b>April 5, 2018</b> (Currently March 29, 2018)

On February 7, 2018, Defendant filed a motion for attorneys' fees (ECF No. 62). On February 8, 2018, Defendant filed a motion for sanctions on Plaintiffs' counsel (ECF No. 64). On February 12, 2018, Plaintiffs' counsel requested an extension to respond to the motions. The reason for the extension is that due to his existing commitments in other matters, responding to the motions within the current timeframe would be impracticable without imposing an undue financial hardship.

On February 13, 2018, the parties conferred regarding a schedule and have agreed to the above stipulated schedule, which extends deadlines for Plaintiffs and Plaintiffs' counsel to oppose and/or respond to the motions as well as Defendant's reply thereof.

For the foregoing reasons, the undersigned parties respectfully request that:

- (1) the deadline for Plaintiffs' response to motion for attorneys' fees be extended to **March 8, 2018** from February 21, 2018;

<sup>1</sup> Subject to the Court's determination on Plaintiffs' counsel's ex parte motion to determine the motion for sanctions improper on procedural grounds

- (2) subject to the Court's determination on Plaintiffs' counsel's ex parte motion to determine the motion for sanctions improper, Plaintiffs' counsel's reply in opposition to motion for sanction be extended to **March 8, 2018** from February 22, 2018;
- (3) the deadline for Defendant's reply in support to his motion for attorneys' fees be extended to **March 22, 2018** from February 28, 2018;
- (4) the deadline for Defendant's replies in support of his motion for sanction be extended to **March 22, 2018** from March 1, 2018;
- (5) a combined hearing on both motions be extended to **April 5, 2018** from March 29, 2018.
- The foregoing is so stipulated among the parties by and through their undersigned counsel.

Dated: February 14, 2018

CHHABRA LAW FIRM, PC  
ROHIT CHHABRA

BY: /s/ Rohit Chhabra

Rohit Chhabra  
Attorney for Plaintiffs Open Source Security, Inc.  
and Bradley Spengler

Dated: February 14, 2018

MELODY DRUMMOND HANSEN  
HEATHER J. MEEKER  
CARA L. GAGLIANO  
O'MELVENY & MYERS LLP

By: /s/ Melody Drummond Hansen

Melody Drummond Hansen  
Attorneys for Defendant Bruce Perens

**ATTESTATION CLAUSE**

I, Rohit Chhabra, hereby attest in accordance with Local Rule 5-1(i)(3) that each signatory has concurred in the filing of this document.

Dated: February 14, 2018

CHHABRA LAW FIRM, PC  
ROHIT CHHABRA

/s/ Rohit Chhabra

Rohit Chhabra  
Attorney for Plaintiffs Open Source Security,  
Inc. and Bradley Spengler

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_  
The Honorable Laurel Beeler  
United States District Magistrate Judge

**DECLARATION**

I, Rohit Chhabra, declare as follows:

1. I am the attorney of record for Plaintiffs in the above-referenced action, and am admitted to practice before this Court. Pursuant to Civil Local Rule 6-2(a), I submit this declaration in support of the parties' Stipulated Request to Set Revised Schedule for Defendant's motion for attorneys' fees and motion for sanction. I have personal knowledge and am informed of the facts stated herein and, if called to testify, I could and would testify completely hereto.

2. On February 7, 2018, Defendant filed a motion for attorneys' fees (ECF No. 62).

3. On February 8, 2018, Defendant filed a motion for sanctions on Plaintiffs' counsel (ECF No. 64).

4. On February 12, 2018, I requested an extension to respond/ oppose to the above referenced motions. The reason for the extension is that due to my existing commitments related to other matters, responding to the above referenced motions within the current timeframe would be impracticable without imposing an undue financial hardship on me.

5. On February 13, 2018, the parties conferred regarding a schedule and have agreed to the above stipulated schedule, which extends deadlines for Plaintiffs and Plaintiffs' counsel to oppose and/or respond to the motions as well as Defendant's reply thereof, as stipulated.

6. The parties' proposals are for the convenience of the parties and the Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed this 14th day of February, 2018 in Mountain View, California.

ROHIT CHHABRA

/s/ Rohit Chhabra

Rohit Chhabra  
Attorney for Plaintiffs Open Source  
Security, Inc. and Bradley  
Spengler