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13 *Attorneys for Plaintiff*
14 *Document Security Systems, Inc.*

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16 **IN THE UNITED STATES DISTRICT COURT**
FOR THE CENTRAL DISTRICT OF CALIFORNIA
17 **SOUTHERN DIVISION**

18 DOCUMENT SECURITY SYSTEMS,
19 INC.,

20 Plaintiff,

21 v.

22 OSRAM GMBH; OSRAM OPTO
SEMICONDUCTORS GMBH & CO.;
23 and OSRAM SYLVANIA INC.,

24 Defendants.

Case No. 2:17-cv-05184-JVS-JCG

STIPULATION TO EXTEND TIME
FOR DEFENDANT OSRAM
SYLVANIA INC. TO RESPOND TO
COMPLAINT AND [PROPOSED]
ORDER THEREON

Complaint served: August 2, 2017
Current response date: August 23, 2017
New response date: September 22, 2017

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1 IT IS HEREBY STIPULATED by and between Plaintiff Document Security
2 Systems, Inc. ("DSS") and Defendant OSRAM SYLVANIA Inc. ("OSI"), through
3 their respective attorneys of record, as follows:

4 WHEREAS, DSS filed its Complaint on July 13, 2017;

5 WHEREAS, DSS served the Complaint on OSI on August 2, 2017;

6 WHEREAS, OSI's response to the Complaint is due on August 23, 2017;

7 WHEREAS, the other Defendants have not yet been served with the
8 Complaint, including Defendant OSRAM GmbH and Defendant OSRAM Opto
9 Semiconductor GmbH & Co., both of which are German corporations and thus are
10 subject to the service procedures set forth under the Hague Convention;

11 WHEREAS, on August 15, 2017, counsel for DSS and counsel for OSI met
12 and conferred to engage in early settlement negotiations, and the parties plan to
13 continue engaging in further settlement negotiations over the coming weeks;

14 WHEREAS, good cause exists for the requested extension, as the parties are
15 still meeting to continue settlement negotiations, DSS is still working on serving the
16 remaining Defendants, and the extension is not being sought for purposes of delay;

17 WHEREAS, the parties have made no prior request for extension of time to
18 this Court;

19 NOW, THEREFORE, DSS and OSI stipulate to the following extension, as
20 stated in the attached [Proposed] Order, subject to the approval of the Court:

21 1. The deadline for Defendant OSRAM SYLVANIA Inc. to answer or
22 otherwise respond to the Complaint is extended to September 22, 2017.

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25 DATED: August 18, 2017

Respectfully submitted,

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By: /s/ Brian Ledahl

Brian Ledahl
RUSS AUGUST & KABAT

*Attorneys for Plaintiff
Document Security Systems, Inc.*

1 DATED: August 18, 2017

By: /s/ Benjamin W. Hattenbach

2 Benjamin W. Hattenbach
3 IRELL & MANELLA LLP

4 *Attorneys for Defendant*
5 *OSRAM SYLVANIA Inc.*

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7 **ATTESTATION OF AUTHORIZATION**

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9 Pursuant to Central District of California Local Rule 5-4.3.4(a)(2)(i), I hereby
10 certify that the content of this document is acceptable to Brian Ledahl, counsel for
11 Plaintiff, and I have obtained his authorization to affix his electronic signature to
12 this document.

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14 DATED: August 18, 2017

By: /s/ Benjamin W. Hattenbach

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