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20 Orissa Holdings, LLC, dba GroundWidgets  
21

22 SUPERIOR COURT OF THE STATE OF CALIFORNIA

23 COUNTY OF SAN FRANCISCO

24 DEEM, INC., and GLOBAL GROUND  
25 AUTOMATION, INC.,

26 Plaintiffs,

27 v.

28 APURVA PATEL, an individual, ORISSA  
HOLDINGS, LLC, individually and dba  
GROUNDWIDGETS,

Defendants.

Case No. CGC-15-543482

**JOINT STIPULATION RE  
DISMISSAL WITHOUT PREJUDICE**

Complaint Filed: January 2, 2015  
Trial Date: None

**ELECTRONICALLY  
FILED**  
*Superior Court of California  
County of San Francisco*  
**07/23/2015**  
**Clerk of the Court**  
BY: MICHAEL RAYRAY  
Deputy Clerk

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3. The statute of limitations on all of plaintiffs' claims against defendants shall be tolled from January 2, 2015 to the date of filing of the New Jersey action so long as the case is re-filed within 60 days of dismissal of the California Action.

1           4.       All parties may commence discovery in the New Jersey action upon service by  
2 plaintiffs of the complaint on defendants. Counsel for defendants in this Action and defendants'  
3 New York attorney, Barry Werbin, Esq., agree to collectively accept service in the New Jersey  
4 action on behalf of defendants. For service of the New Jersey action pursuant to this paragraph  
5 to be effective, plaintiffs shall, on the same day, serve Howard Slavitt via both email and  
6 overnight mail or certified mail, and also Barry Werbin via both email and overnight or certified  
7 mail.

8           5.       Discovery produced in the Action shall be deemed produced in the future New  
9 Jersey action after the New Jersey complaint is filed and served, and shall remain subject to the  
10 protective order agreement that the parties' counsel signed in the Action. The parties shall  
11 negotiate an appropriate form of protective order in the New Jersey action that conforms with the  
12 requirements of the New Jersey court in which it is filed.

13           6.       Except as and only to the extent otherwise explicitly provided herein, by entering  
14 into this stipulation neither plaintiffs nor defendants waive, and each expressly reserves, all  
15 rights, claims and defenses that each has in the Action and the New Jersey action.

16           7.       The parties request that the Case Management Conference scheduled for  
17 September 23, 2015 in the Action be taken off calendar and vacated.

18           IT IS SO STIPULATED.

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21 DATED: July 23, 2015

GREENBERG TRAURIG LLP

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24 By: /s/ Ian C. Ballon  
25 Ian C. Ballon  
26 Attorneys for Plaintiffs  
27 Global Ground Automation, Inc. and Deem, Inc.  
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1  
2 DATED: July 23, 2015

COBLENTZ PATCH DUFFY & BASS LLP

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5 By: /s/ Howard A. Slavitt  
Howard A. Slavitt  
Attorneys for Defendants  
6 Apurva Patel, Orissa Holdings, LLC, dba  
7 GroundWidgets  
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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years  
4 and not a party to the within action; my business address is **4 Embarcadero Center, Suite 3000,**  
5 **San Francisco, California 94111.**

6 On the date given below, I served the **JOINT STIPULATION RE DISMISSAL**  
7 **WITHOUT PREJUDICE** on the interested parties in this action as follows:

8 Jeffrey G. Knowles  
9 Howard A. Slavitt  
10 Fredrick C. Crombie  
11 Coblenz Patch Duffy & Bass LLP  
12 One Ferry Building, Suite 200  
13 San Francisco, CA 94111  
14 Email: jgk@coblenzlaw.com;  
15 hslavitt@cpdb.com; ef-fcc@cpdb.com

***Defendants APURVA PATEL and ORISSA***  
***HOLDINGS, LLC dba GROUNDWIDGETS***



17 **(BY U.S. MAIL)**

18 I placed the document(s) listed above in a sealed envelope with postage thereon fully  
19 prepaid, in the United States mail at San Francisco, California, addressed as set forth  
20 above, or as stated on the attached service list. I am readily familiar with the business  
21 practice of my place of employment in respect to the collection and processing of  
22 correspondence, pleadings and notices for mailing with United States Postal  
23 Service/Express Mail, Federal Express and other overnight mail services. The foregoing  
24 sealed envelope was placed for collection and mailing this date consistent with the  
25 ordinary business practice of my place of employment, so that it will be picked up this  
26 date with postage thereon fully prepaid at San Francisco, California, in the ordinary  
27 course of such business.



**(BY E-MAIL)**

I caused the documents to be sent to the persons at the e-mail addresses listed above, or  
as stated on the attached service list. I did not receive, within a reasonable time after the  
transmission, any electronic message or other indication that the transmission was  
unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

Executed on July 23, 2015, at San Francisco, California.

By: /s/ Sharon J. Skandalaris  
Sharon J. Skandalaris