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Attorneys for Plaintiff

Contractor Management Services, LLC d/b/a Openforce

Counsel for Defendants Listed on Signature Page

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Contractor Management Services, LLC)
d/b/a Openforce,)

Plaintiff,)

v.)

Para, Inc. d/b/a GigSafe; David)
Pickerell,)

Defendants.)

CASE NO. CV-25-01645-PHX-DWL

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT (FIRST
EXTENSION)**

1 Plaintiff Contractor Management Services, LLC d/b/a Openforce (“Openforce”) and
2 Defendants Para, Inc. d/b/a GigSafe (“GigSafe”) and David Pickerell (collectively with
3 GigSafe, “Defendants,” who are collectively with Openforce, the “Parties”) hereby file this
4 stipulation to extend Defendants’ deadline to answer or otherwise respond (including filing a
5 motion to dismiss) to Openforce’s Complaint to June 30, 2025. The Parties agree as follows:

6 1. Openforce filed its Complaint on May 14, 2025. ECF No. 1.

7 2. GigSafe was served with the Complaint on May 16, 2025; its current deadline to
8 answer or otherwise respond to the Complaint is June 6, 2025. Mr. Pickerell has not yet been
9 served.

10 3. The undersigned counsel for Defendants agrees to accept service on behalf of
11 Mr. Pickerell, without waiving any rights, including any objections to venue or jurisdiction
12 (including personal jurisdiction).

13 4. Openforce agrees that Defendants’ deadline to answer or otherwise respond to
14 the Complaint shall be extended to June 30, 2025.

15 5. Within 24 hours of the filing of this Stipulation, Defendants will e-mail the
16 following message to all Gigsafe employees and contractors: “As you know, Openforce has
17 sued Gigsafe for allegedly, among other things, accessing its system. You are instructed to
18 refrain from enrolling or onboarding (or attempting to enroll or onboard) Openforce programs
19 through Openforce customer portals or with Openforce customer activation codes, and from
20 accessing Openforce Client Admin portals. If you have previously enrolled or onboarded in
21 Openforce programs, through Openforce customer portals, or with Openforce customer
22 activation codes, or have previously accessed Openforce Client Admin portals, you are
23 instructed to refrain from accessing the Openforce accounts you used.”

24 6. Nothing in this Stipulation or agreement shall: (a) prejudice any Party’s right to
25 seek or oppose a court order allowing or disallowing the conduct referenced in the e-mail in
26 paragraph 5 above or described in the Complaint, or otherwise modifying the terms of this
27 agreement; and (b) constitute an admission as to the propriety or impropriety of the conduct
28

referenced in the e-mail in paragraph 5 above or described in the Complaint, or an admission as to whether any such conduct has or has not occurred.

7. This Stipulation and the e-mail referenced in paragraph 5 shall not be used as evidence in any trial, referenced in the presence of any jury, or used to imply, suggest, or state to the jury that either party did anything improper.

8. This is the first extension of time requested by any party in this matter.

Dated: May 23, 2025

By: s/ Richard S. Krumholz

By: s/ David S. Almeling

**NORTON ROSE FULBRIGHT US
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