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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

COINLAB, INC., a Delaware Corporation

Plaintiffs,

v.

MT. GOX KK, a Japanese corporation and
TIBANEE KK, a Japanese corporation.

Defendant.

Case No. 2:13-cv-00777

STIPULATION RE FILING OF
AMENDED COMPLAINT

The parties submit this stipulation in conjunction with Plaintiff Coinlab, Inc.'s filing of its First Amended Complaint.

Whereas, on May 2, 2013 Plaintiff CoinLab, Inc. ("CoinLab") filed the original Complaint (Dkt. No. 1) in this action.

Whereas, on September 10, 2013 Defendants MtGoxKK and Tibanne KK filed their Answer to the Complaint and also filed a Counterclaim (Dkt. No. 18) ("the September 10 Counterclaim")

Whereas, on October 3, 2013 each of the parties served Fed. R. Civ. P. 26(a)(1)(A) initial disclosures.

1 Whereas, on October 4, 2013 CoinLab filed its Answer to the September 10
2 Counterclaim (Dkt. No. 21)("October 4 Answer").

3 Whereas, on October 10, 2013 the parties filed their Joint Status Report and
4 Discovery Plan (Dkt. No. 22).

5 Whereas, on October 17, 2013 Defendants served on CoinLab a First Set of
6 Interrogatories ("the Interrogatories") , a First Set of Requests for the Production of
7 Documents ("the RFPs"), and a First Set of Requests for Admissions (the "RFAs").

8 Whereas, on October 17, 2013 the Court entered the Order Setting Trial Date &
9 Related Dates (Dkt. No. 23).

10 Whereas, on November 18, 2013 CoinLab served written responses to the
11 Interrogatories, RFPs and RFAs.

12 Whereas, CoinLab now seeks to file a First Amended Complaint, a true and correct
13 copy of which is attached hereto as EXHIBIT A .

14 In light of the foregoing the parties stipulate and agree as follows:

15 1. Plaintiff CoinLab, Inc. is filing its the First Amended Complaint, a true and
16 correct copy of which is attached hereto as EXHIBIT A (the "First Amended Complaint")
17 simultaneously with this Stipulation.

18 2. Within 14 days of the filing of this Stipulation Defendants shall respond to
19 the First Amended Complaint, by answer, motion or otherwise. The parties need not file a
20 further Counterclaim and/or Answer to the Counterclaim and the September 10
21 Counterclaim and CoinLab's October 4 Answer shall remain the operative pleadings in this
22 regard.

23 3. Within 10 days of the filing of this Stipulation, CoinLab will serve a
24 supplemental disclosure under Fed. R. Civ. P. 26 (a)(1)(A) that sets forth all information
25 called for under Fed. R. Civ. P. 26 (a)(1)(A)(i)-(iv) as it relates to the First Amended
26 Complaint, the September Counterclaim and CoinLab's October 4 Answer, including all
27 categories of recovery being sought by CoinLab in this action, including damages,

1 restitution, or otherwise, the amount being sought in each such category, and how each such
2 amount is computed or determined.

3 4. Any and all references to the "Complaint" in the Interrogatories, the RFPs
4 and RFAs shall be deemed to include the First Amended Complaint, and in responding to
5 the Interrogatories, the RFPs and RFAs CoinLab shall provide any and all documents and
6 information that relate to the First Amended Complaint.

7 5. The scope of Interrogatory No. 22 of the Interrogatories and Request No.44
8 of the RFPs shall include not just damages but all categories of recovery CoinLab is seeking
9 to recover, including all elements of recovery based on restitution; and, within 10 days of he
10 filing of this Stipulation CoinLab provide supplemental responses to Interrogatory No. 22 of
11 the Interrogatories and Request No. 44 of the RFPs which supplemental responses CoinLab
12 shall provide all documents and information called for that relate to all categories of
13 recovery CoinLab is seeking to recover, including all elements of recovery based on
14 restitution.

15 6. By stipulating to the filing of the First Amended Complaint Defendants are
16 not acknowledging that any of the claims asserted in it have merit and reserve all defenses,
17 including that any and/ or all such claims fail to state a claim or otherwise entitle CoinLab to
18 any type of relief.

1 Dated: November 25, 2013

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25 Attorneys for Plaintiff CoinLab

1 Dated: November 25, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and I caused the foregoing to be served upon the following by email:

Dated: November 25, 2013

By: /s/Lindsey Godfrey Eccles