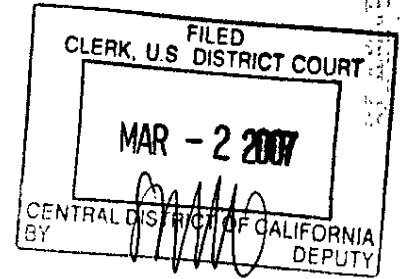


Adam Pick v. Fremantlemedia North America Inc et al

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1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
 2 George R. Hedges (Bar No. 081873)
 3 georgehedges@quinnemanuel.com
 4 Stan Karas (Bar No. 222402)
 5 stankaras@quinnemanuel.com
 865 South Figueroa Street, 10th Floor
 Los Angeles, California 90017-2543
 Telephone: (213) 443-3000
 Facsimile: (213) 443-3100



6 Attorneys for defendants
 FremantleMedia North America, Inc.;
 7 American Idol Productions, Inc.; Fox
 Broadcasting Company; Fox Interactive
 8 Media Inc.

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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

ADAM PICK, an individual doing
 business as Idol Go Home,

Plaintiff,

vs.

FREMANTLEMEDIA NORTH
 AMERICA, Inc., a Delaware
 corporation; AMERICAN IDOL
 PRODUCTIONS, INC., a California
 corporation; FOX BROADCASTING
 COMPANY, a Delaware corporation;
 FOX INTERACTIVE MEDIA, INC., a
 Delaware corporation; and Does 1
 through 10, inclusive,

Defendants.

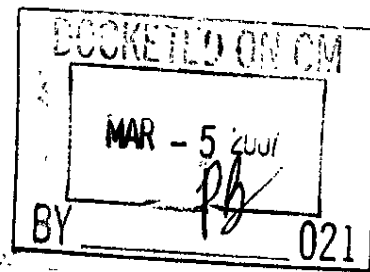
And Related Cross-Action

CASE NO. CV 07-728 AHM (CTx)

**STIPULATION REGARDING
 MOTION TO REMAND AND
 SCHEDULING CONFERENCE;**

[PROPOSED] ORDER
[Signature]

ORIGINAL



6

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD,
2 WHEREAS defendants removed this action to federal court on January 31,
3 2007;

4 WHEREAS the Court has set a Rule 26(f) scheduling conference for March
5 19, 2007, and ordered the parties to submit a joint Rule 26(f) report by March 12,
6 2007;

7 WHEREAS plaintiff intends to file a motion for remand on March 2, 2007,
8 and the parties believe that it would be productive and efficient to obtain a ruling on
9 that motion before the parties engage in discovery procedures prescribed by Rule
10 26;

11 WHEREAS defendants' lead counsel George R. Hedges will be out of the
12 country until April 16, 2007;

13 WHEREAS the parties have not previously sought any extensions of time
14 from this Court;

15 The parties hereby STIPULATE AND AGREE as follows:

16 1. The hearing on plaintiff's motion to remand will be set for April 16,
17 2007. Defendants' opposition will be filed and served by March 21, 2007.
18 Plaintiff's reply papers will be filed and served by April 9, 2007.

19 2. The Rule 26(f) scheduling conference shall be continued to May 14,
20 2007. The parties' joint Rule 26 report shall be filed by May 7, 2007.

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1 DATED: March 1, 2007

Quinn Emanuel Urquhart Oliver & Hedges, LLP

2

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By 

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Stan Karas
Attorneys for Defendants and Cross-Complainants

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6 DATED: March 1, 2007

Valle and Associates

7

8

By _____
Jeffrey Valle
Attorneys for Plaintiff and Cross-Defendant

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10

[PROPOSED] ORDER

11

12

The Court has reviewed the parties' stipulation. GOOD CAUSE

13

APPEARING,

14

1. The hearing on plaintiff's motion to remand is set for April 16, 2007.

15

Defendants' opposition will be filed and served by March 21, 2007. Plaintiff's reply papers will be filed and served by April 9, 2007.

16

17

2. The Rule 26(f) scheduling conference shall be continued to May 14,

18

2007. The parties' joint Rule 26 report shall be filed by May 7, 2007.

19

IT IS SO ORDERED.

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DATED: March 2, 2007

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This is an unusually lengthy delay. Counsel should not expect comparable delays later on if the remand motion is denied.

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Honorable A. Howard Matz
United States District Court

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1 DATED: March 1, 2007

Quinn Emanuel Urquhart Oliver & Hedges, LLP

2
3
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5

By _____
Stan Karas
Attorneys for Defendants and Cross-Complainants

6 DATED: March 1, 2007

Valle & Associates

7
8
9

By Katherine Pratt
Katherine Pratt
Attorneys for Plaintiff and Cross-Defendant

[PROPOSED] ORDER

12 The Court has reviewed the parties' stipulation. GOOD CAUSE

13 APPEARING,

14 1. The hearing on plaintiff's motion to remand is set for April 16, 2007.
15 Defendants' opposition will be filed and served by March 21, 2007. Plaintiff's reply
16 papers will be filed and served by April 9, 2007.

17 2. The Rule 26(f) scheduling conference shall be continued to May 14,
18 2007. The parties' joint Rule 26 report shall be filed by May 7, 2007.

19 IT IS SO ORDERED.

20 DATED: March . 2007

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Honorable A. Howard Matz
United States District Court

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543.

On March 1, 2007, I served true copies of the following document(s) described as **STIPULATION REGARDING MOTION TO REMAND AND SCHEDULING CONFERENCE; [PROPOSED] ORDER**, on the parties in this action as follows:

Jeffrey B. Valle, Esq.
Valle & Associates
1250 Sixth Street
Suite 201
Santa Monica, CA 90401
Tel. 310-260-8600
Fax: 310-260-8677

BY MAIL: I am "readily familiar" with the practices of Quinn Emanuel Urquhart Oliver & Hedges for collecting and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. I enclosed the foregoing in sealed envelope(s) addressed as shown above, and such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Los Angeles, California, on that same day following ordinary business

BY FACSIMILE: I caused said document(s) to be transmitted by facsimile pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was (213) 443-3100. The name(s) and facsimile machine telephone number(s) of the person(s) served are set forth in the service list. The document was transmitted by facsimile transmission, and the sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

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

Executed on March 1, 2007, at Los Angeles, California.



ELVA GALINDO