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15 Attorneys for Defendants and Counter-Claimants,

16 WILLIAM PARDINI, and B.T.B., Inc.

17
18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**

20
21 CREDIT BUREAU CONNECTION,
22 INC., a California Corporation

23 Plaintiff(s),

24 v.

25 WILLIAM PARDINI, an individual;
26 B.T.B., INC., a California Corporation
27 dba DATA CONSULTANTS,

28 Defendants.

Case No.: CV-F-10-1202 LJO-DLB
[Complaint filed: 7/1/2010]
[Assigned for all Purposes to the
Honorable Lawrence J. O'Neill,
Ct. DJ]

STIPULATION FOR SUBMISSION
OF CLOSING DOCUMENTS AND
PROPOSED ORDER

1 B.T.B., INC., a California Corporation,
2 dba DATA CONSULTANTS,
3
4 Counter-Claimant,
5
6 v.
7
8 CREDIT BUREAU CONNECTION,
9 INC., a California Corporation, and
10 DARIN LARSEN, an individual.
11
12 Counter-Defendants.

13 The parties respectfully submit this Stipulation and Proposed Order as
14 follows:

15 The parties to the above captioned lawsuit participated in multiple
16 settlement conferences and settled their dispute on May 18, 2011. On that
17 date, the parties signed a six page Memorandum of Understanding which
18 memorializes the settlement terms. Since then, the parties have diligently
19 exchanged multiple drafts of the closing documents, including a draft
20 Settlement and Mutual Release Agreement, an eCredit Use Agreement, a
21 License and Support Services Agreement, and an Assignment of Copyright
22 Agreement. Due to the complexity of the documents and other
23 commitments, the documents have not yet been finalized.

24 Counsel will continue to work diligently to complete the closing
25 documents and expect that the documents will be signed on or before
26 August 1, 2011. Counsel will then execute a Stipulation for Dismissal on or
27 before August 4, 2011.

28 If it appears that the parties cannot agree on any provisions of the final
documents, plaintiff's counsel will contact Magistrate Judge Dennis L. Beck
for a telephonic conference on or before August 4, 2011.

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DATED: July 11, 2011

STONE | ROSENBLATT | CHA
A Professional Law Corporation

By: _____ /s/
Kristi W. Dean, Esq.
Leslie A. Blozan, Esq.
Amy W. Lewis, Esq.
Attorneys for Plaintiff/Cross-
Defendants,
CREDIT BUREAU
CONNECTION, INC., a California
Corporation

DATED: July 11, 2011

Law Offices of David A. Makman

By: _____ /s/
David A. Makman
Attorneys for Defendants and
Cross-claimants, WILLIAM
PARDINI and B.T.B. Inc. dba
DATA CONSULTANTS

IT IS SO ORDERED.

Dated: July 12, 2011

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE