

1 HANSON BRIDGETT MARCUS VLAHOS & RUDY, LLP
 LAWRENCE M. CIRELLI - 114710
 2 JULIA H. VEIT - 209207
 333 Market Street, 21st Floor
 3 San Francisco, CA 94105-2173
 Telephone: (415) 777-3200
 4 Facsimile: (415) 541-9366
 lcirelli@hansonbridgett.com
 5

6 JACKSON WALKER, LLP
 ROBERT P. LATHAM – Texas Bar No. 11975500
 7 JEFFREY D. ANTONSON- Texas Bar No. 24040441
 901 Main Street, Suite 600
 8 Dallas, TX 75202
 Telephone: (214) 953-6000
 9 Facsimile: (214) 953-5822
 (Admitted *Pro Hac Vice*)
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11 Attorneys for Plaintiff
 BHARI INFORMATION TECHNOLOGY
 SYSTEMS PVT., LTD.
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13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

16
 17 BHARI INFORMATION TECHNOLOGY
 SYSTEMS PVT., LTD.,

Civil Action No. C 05 1223 SI

18 Plaintiff,

**STIPULATION AND [PROPOSED]
 ORDER WITHDRAWING ORDER OF
 DISMISSAL.**

19 v.

20 ALLIED BOSTON BANK, INC.,
 21 ALLIED BOSTON INTERNATIONAL,
 INC., LAL BHATIA, JACK GROVER,
 and MARZBAN MODY,
 22

Action Filed: March 25, 2005

23 Defendants.
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Bhari Information Technology Systems Pvt., Ltd. ("Bitech") and Lal Bhatia ("Bhatia"), by their attorneys, move this Court to withdraw the Order of Dismissal Upon Settlement entered on September 1, 2006.

The Settlement reached by the parties requires further action by the Court to enforce the settlement between the parties. Paragraph 3(a) requires the Court to enter an Agreed Judgment in the amount of three-hundred and sixty thousand dollars (\$360,000.00) against Bhatia. Paragraph 3(d) requires that Bitech seek default judgments against Marzban Mody, Allied Boston Bank, and Allied Boston International, and has assigned these default judgments to Bhatia. Bitech will shortly file its application for default and seeking a hearing to determine damages for the defaulting defendants. After that hearing, the parties will draft for the Court's signature a final judgment containing both the agreed judgment and the default judgments.

Accordingly, in order to enforce the provisions of the settlement agreed upon, the parties request that the Court withdraw the Order of Dismissal Upon Settlement entered on September 1, 2006.


Dated: November __, 2006

LAW OFFICES OF SUNITA KAPOOR

By: _____
SUNITA KAPOOR
Attorneys for Defendant
LAL BHATIA

DATED: November 30, 2006

JACKSON WALKER, LLP

By:  _____
ROBERT P. LATHAM
JEFFREY DEAN ANTONSON
Attorneys for Plaintiff
BHARI INFORMATION TECHNOLOGY
SYSTEMS PVT., LTD.

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15 Dated: November 30, 2006

LAW OFFICES OF SUNITA KAPOOR

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17
18 By: Sunita Kapoor
19 SUNITA KAPOOR
20 Attorneys for Defendant
LAL BHATIA

21 DATED: November _____, 2006

JACKSON WALKER, LLP

22
23 By: _____
24 ROBERT P. LATHAM
25 JEFFREY DEAN ANTONSON
26 Attorneys for Plaintiff
BHARI INFORMATION TECHNOLOGY
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Based on the foregoing representations, **ORDER**

The Order of Dismissal Upon Settlement, entered by the Court on September 1, 2006, is hereby withdrawn.

IT IS SO ORDERED.

November ____, 2006



HONORABLE SUSAN ILLSTON
United States District Court Judge