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8 Attorneys for Plaintiff
 9 ALL POINTS CAPITAL CORP., a New York
 10 corporation

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

14 ALL POINTS CAPITAL CORP., a New
 15 York corporation,

16 Plaintiff,

17 v.

18 ARCHITECTURAL METAL PRODUCTS,
 19 INC., an Alaska corporation; PACIFIC
 20 ROLLFORMING, LLC, an Alaska limited
 liability company; RIDGETOP HAWAII,
 INC., an Hawaiian corporation; RIDGETOP
 ROOFING AND GUTTER, INC., an Alaska
 corporation; ROBERT OLLMAN, a citizen
 of the State of Wisconsin; BORIS
 GOKHMAN, a citizen of the State of
 Wisconsin; VLADIMIR SHUK, a citizen of
 the State of Wisconsin; and TODD
 BEASLEY, a citizen of the State of Alaska,

21 Defendants.

Case No. C 08-04394 VRW

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE THE CASE
 MANAGEMENT CONFERENCE**

CURRENT Case Management Conference:

Date: January 8, 2009
 Time: 3:30 P.M.
 Place: Courtroom 6
 17th Floor
 United States District Courthouse
 450 Golden Gate Ave.
 San Francisco, California

PROPOSED Case Management Conference:

Date: ~~March 12, 2009~~ March 19, 2009

1 WHEREAS Plaintiff All Points Capital Corp., a New York corporation (“Plaintiff”), is
2 represented by Arent Fox LLP, by attorneys in the New York and Los Angeles offices of the
3 firm;

4 WHEREAS Defendants Architectural Metal Products, Inc., an Alaska corporation, Pacific
5 Rollforming, LLC, an Alaska limited liability company, Ridgetop Hawaii, Inc., an Hawaiian
6 corporation, Ridgetop Roofing and Gutter, Inc., an Alaska corporation, and Todd Beasley, a
7 citizen of the State of Alaska (sometimes collectively referred to herein as the “Beasley
8 Defendants”) are represented by Frederick Phillips, an attorney whose office is in San Diego,
9 California,

11 WHEREAS Defendant Boris Gokhman, a citizen of the State of Wisconsin is appearing
12 *Pro Se* in this action (“Defendant Gokham”),

14 WHEREAS Defendant Vladimir Shuk, a citizen of the State of Wisconsin is also
15 appearing *Pro Se.* in this action (“Defendant Shuk”); and

16 WHEREAS the parties are attempting to negotiate a stipulated judgment, all of the parties
17 have expressed a willingness to resolve this dispute by a stipulated judgment, and the parties
18 desire additional time for their negotiations to proceed without the added expense of traveling to
19 San Francisco for the joint case management conference currently set for January 8, 2009;

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ALL POINTS CAPITAL v. ARCHITECTURAL METAL PRODUCTS
CASE NO.: C 08-04394 VRW
USDC, NORTHERN DISTRICT, SAN FRANCISCO
PROOF OF SERVICE

I am a citizen of the United States. My business address is ARENT FOX LLP, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013. I am employed in the county of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within cause.

On December 29, 2008 I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all parties appearing on the docket sheet:

Stipulation and [Proposed] Order to Continue The Case Management Conference

(BY FAX) by transmitting via facsimile from facsimile number (213) 629-7401 the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m. A statement that this document was successfully transmitted without error is hereby attached to this Proof of Service.

X (BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person(s) listed below, or as stated on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.

(BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing the document(s) to the persons(s) listed below or as stated in the attached service list.

(BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s) addressed to the person(s) listed below or as stated on the attached service list, and caused those envelopes to be delivered to an overnight delivery carrier, with delivery fees provided for, for next-business-day delivery to whom it is to be served.

X (BY ECF) I caused said documents to be transmitted using the Court's ECF system.

SEE ATTACHED SERVICE LIST

X (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under the penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on December 29, 2008, at Los Angeles, California


Barbara Anderson

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| Frederick C. Phillips, Esq. Phillips, Haskett & Ingwalson 701 "B" Street, Suite 1190 San Diego, CA 92101 Tel.: (619) 231-3737 Fax: (619) 233-1223 Via ECF | Vladimir Shuk in Pro Per New Land 1840 North Farwell Avenue, #203 Milwaukee, WI 53202 Via U. S. Mail Boris Gokhman in Pro Per New Land 1840 North Farwell Avenue, #203 Milwaukee, WI 53202 Via U.S. Mail |
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