

1 David G. Bayles (SBN 208112)  
 2 ARENT FOX LLP  
 3 555 West Fifth Street, 48th Floor  
 4 Los Angeles, CA 90013-1065  
 Telephone: (213) 629-7400  
 Facsimile: (213) 629-7401

5 Attorney for Plaintiff  
 6 ALL POINTS CAPITAL CORP., a New York  
 7 corporation

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

12 ALL POINTS CAPITAL CORP., a New  
 13 York Corporation,,  
 14 Plaintiff,

15 v.

16 ARCHITECTURAL METAL  
 17 PRODUCTS, INC., an Alaska corporation;  
 18 PACIFIC ROLLFORMING, LLC, an  
 19 Alaska limited liability company;  
 20 RIDGETOP HAWAII, INC., an Hawaiian  
 21 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; and  
 TODD BEASLEY, a citizen of the State of  
 Alaska.,

22 Defendants.

Case No.: C 08-04394 VRW

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE CASE  
 MANAGEMENT CONFERENCE**

**CURRENT Case Management Conference:**

Date: March 19, 2009  
 Time: 3:30 P.M.  
 Judge: Courtroom 6  
 17<sup>th</sup> Floor  
 United States District Courthouse  
 450 Golden Gate Avenue  
 San Francisco, California

**PROPOSED Case Management Conference:**

Date: May 21, 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,

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

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

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

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the  
2 Court, the case management conference shall be continued for approximately sixty days until  
3 May \_\_, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date  
4 and time as may be convenient for the Court.

5 Dated: Arent Fox LLP

6  
7 By: DAVID G. BAYLES  
8 Attorneys for Plaintiff  
9 ALL POINTS CAPITAL CORP.

10 Dated: By: FREDERICK PHILLIPS, on behalf of  
11 Architectural Metal Products,  
12 Rollforming, LLC, Ridgetop Hawaii,  
13 Inc., Ridgetop Roofing and Gutter, Inc.,  
14 and Tom Beasley

13 Dated: 03/08/09 By: BORIS GOKHMAN, Pro Se

15 Dated: 3/8/09 By: VLADIMIR SHUK, Pro Se

17 **[PROPOSED] ORDER**

18 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing  
19 therefore, the case management conference in the above-referenced action currently set for  
20 March \_\_, 2009, is hereby continued until May \_\_, 2009, at 3:30 p.m. or \_\_\_\_\_ in  
21 Courtroom 6 of the above-entitled Court.

22 IT IS SO ORDERED.

24 Dated: \_\_\_\_\_  
25 The Hon. Vaughn R. Walker  
26 United States District Judge

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the  
2 Court, the case management conference shall be continued for approximately sixty days until  
3 May \_\_, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date  
4 and time as may be convenient for the Court.

5 Dated: Arent Fox LLP

6  
7 By: DAVID G. BAYLES  
8 Attorneys for Plaintiff  
9 ALL POINTS CAPITAL CORP.

10 Dated: 3-6-09

11 By: Fredrick Phillips  
12 FREDERICK PHILLIPS, on behalf of  
13 Architectural Metal Products,  
14 Rollforming, LLC, Ridgetop Hawaii,  
15 Inc., Ridgetop Roofing and Gutter, Inc.,  
16 and Todd Beasley

17 Dated: By: BORIS GOKHMAN, Pro Se

18 Dated: By: VLADIMIR SHUK, Pro Se

19 **PROPOSED ORDER**

20 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing  
21 therefore, the case management conference in the above-referenced action currently set for  
22 March \_\_, 2009, is hereby continued until May \_\_, 2009, at 3:30 p.m. or \_\_\_\_\_ in  
23 Courtroom 6 of the above-entitled Court.

24 IT IS SO ORDERED.

25 Dated: \_\_\_\_\_  
26 The Hon. Vaughn R. Walker  
27 United States District Judge  
28

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the  
2 Court, the case management conference shall be continued for approximately sixty days until  
3 May 21, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date  
4 and time as may be convenient for the Court.

5 Dated: 3/9/09

Arent Fox LLP

6  
7 By:   
8 DAVID G. BAYLES  
9 Attorneys for Plaintiff  
10 ALL POINTS CAPITAL CORP.

11 Dated:

12 By: \_\_\_\_\_  
13 FREDERICK PHILLIPS, on behalf of  
14 Architectural Metal Products,  
15 Rollforming, LLC, Ridgetop Hawaii,  
16 Inc., Ridgetop Roofing and Gutter, Inc.,  
17 and Todd Beasley

18 Dated:

19 By: \_\_\_\_\_  
20 BORIS GOKHMAN, *Pro Se*

21 Dated:

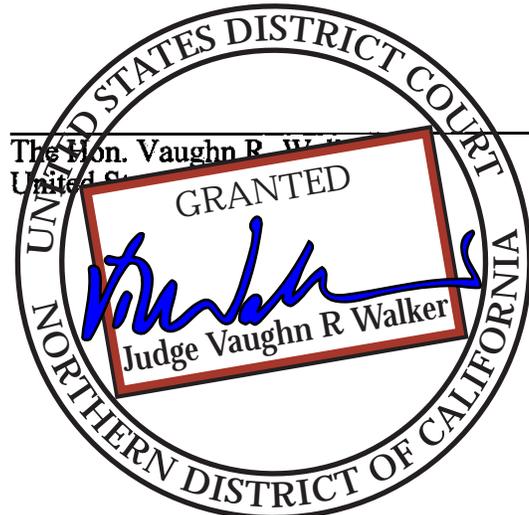
22 By: \_\_\_\_\_  
23 VLADIMIR SHUK, *Pro Se*

24 **PROPOSED ORDER**

25 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing  
26 therefore, the case management conference in the above-referenced action currently set for  
27 March 19, 2009, is hereby continued until May 21, 2009, at 3:30 p.m. or \_\_\_\_\_ in  
28 Courtroom 6 of the above-entitled Court.

IT IS SO ORDERED.

Dated: 3/10/2009 \_\_\_\_\_



1                   **ALL POINTS CAPITAL V. ARCHITECTURAL METAL PRODUCTS**  
2                   **CASE NO.: C 08-04394 VRW**  
3                   **USDC, NORTHERN DISTRICT, SAN FRANCISCO**  
4                   **PROOF OF SERVICE**

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

8                   On March 9, 2009, I electronically filed the following document(s) with the Clerk of the  
9 Court using the CM/ECF system, which sent electronic notification of such filing to all parties  
10 appearing on the docket sheet:

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

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

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

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

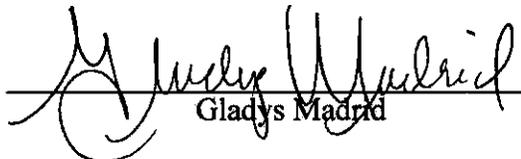
25                   (BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s)  
26 addressed to the person(s) listed below or as stated on the attached service list, and caused  
27 those envelopes to be delivered to an overnight delivery carrier, with delivery fees  
28 provided for,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

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SEE ATTACHED SERVICE LIST**

**(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 March 9, 2009, at Los Angeles, California.

  
Gladys Madrid

Frederick C. Phillips, Esq.  
Phillips, Haskett & Ingwalson  
701 "B" Street, Suite 1190  
San Diego, CA 92101  
Tel.: (619) 231-3737  
Fax: (619) 233-1223

Vladimir Shuk in Pro Per  
New Land  
1840 North Farwell Avenue, #203  
Milwaukee, WI 53202

**Via U. S. Mail**

**Via ECF**

Boris Gokhman in Pro Per  
New Land  
1840 North Farwell Avenue, #203  
Milwaukee, WI 53202

**Via U.S. Mail**