

1 John J. Verber, CASB# 139917  
2 Jack W. Schwartz Jr., CASB #124506  
3 BURNHAM BROWN  
4 A Professional Law Corporation  
5 P.O. Box 119  
6 Oakland, California 94604  
7 ---  
8 1901 Harrison Street, 14th Floor  
9 Oakland, California 94612  
10 Telephone: (510) 444-6800  
11 Facsimile: (510) 835-6666  
12 Email: jverber@burnhambrown.com

13 Attorneys for Plaintiff and Counter-Defendant  
14 STEVENSON ENTERPRISES, a California general  
15 partnership

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA

18 STEVENSON ENTERPRISES, a California  
19 general partnership

20 Plaintiff,

21 v.

22 ENRIQUETA MENDOZA; ESTATE OF  
23 DAVID Z. MENDOZA; HAK CHON LEE;  
24 JEUM SOON LEE; HYSL, Inc., a California  
25 corporation; and YONG W. LEE,

26 Defendants.

27 AND RELATED CROSS-CLAIMS AND  
28 COUNTER-CLAIMS

No. C 08-4845 EMC

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING FILING OF  
REQUEST FOR ENTRY OF  
JUDGMENT AGAINST DEFENDANT  
HAK LEE**

AND RESETTING CMC

29 Plaintiff STEVENSON ENTERPRISES ("*Plaintiff*" or "*STEVENSON*"), and defendant  
30 cross-claimant and counter claimant HAK CHON LEE ("*HAK LEE*") stipulate as follows:

- 31 1. HAK LEE has previously stipulated that Plaintiff may obtain a Judgment against  
32 him.
- 33 2. At the May 23, 2013 Case Management Conference, Plaintiff requested additional

1 time to file its request for entry of a Judgment against HAK LEE. The Court granted  
2 this request.

- 3 3. Plaintiff anticipated filing its request once it had completed the steps necessary for  
4 the regulatory agency, the Alameda County Water Agency ("Agency") to issue a low  
5 risk site closure determination. At the time, Plaintiff anticipated obtaining the  
6 Agency's determination before the present date.
- 7 4. Obtaining the Agency's determination would serve as a date which Plaintiff could  
8 use to liquidate its damages in support of its request for a Judgment against HAK  
9 LEE.
- 10 5. Plaintiff continues taking the steps necessary to obtain a determination from the  
11 Agency; however, the process is not yet complete. Plaintiff's expert intends on  
12 scheduling a meeting with the Agency in October 2013 in order to present Plaintiff's  
13 case for an Agency determination that the site has been remediated and a low risk site  
14 closure should be issued.
- 15 6. Based thereon, Plaintiff and HAK LEE stipulate that Plaintiff shall have up to and  
16 including January 15, 2014 to file its request for entry of a Judgment against HAK  
17 LEE.

18 IT IS SO STIPULATED:

19 DATED: September 17, 2013

BURNHAM BROWN

21 By: /s/ Jack W. Schwartz Jr.  
22 JACK W. SCHWARTZ JR.  
23 Attorneys for Plaintiff STEVENSON  
ENTERPRISES

24 DATED: September 17, 2013

/s/ Brian H. Lee  
25 BRIAN H. LEE  
26 Attorney for Defendant HAK CHON LEE  
27

**CERTIFICATION**

I, Jack W. Schwartz Jr., hereby attest, pursuant to N.D. Cal General Order No. 45, that the concurrence to the filing of this document has been obtained from counsel for HAK CHON LEE.

/s/ Jack W. Schwartz, Jr.  
Jack W. Schwartz Jr.

**ORDER**

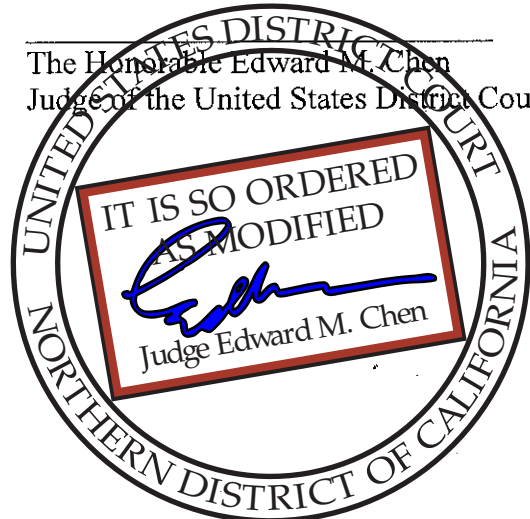
The Court, having reviewed the Stipulation of the Parties, AND FOR GOOD CAUSE APPEARING orders:

1. Plaintiff shall have up to and including January 15, 2014 to file its papers in support of its Request For Entry Of Judgment Against defendant HAK LEE.

IT IS SO ORDERED. The Further CMC is reset from 9/26/13 to 1/23/14 at 10:30 a.m. An updated joint CMC Statement shall be filed by 1/16/14.

Dated: September <sup>18</sup> \_\_, 2013

The Honorable Edward M. Chen  
Judge of the United States District Court



4847-9410-2805, v. I