

\*E-Filed 12/22/10\*

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8  
 9 UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

10 IGUAÇU, INC.,

Case No. C 09-0380 RS (EMC)

11 Plaintiff,

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE CASE  
 MANAGEMENT CONFERENCE FROM  
 JANUARY 13, 2011 TO APRIL 7, 2011**

12 v.

13 ANTONIO CABRERA MANO FILHO,

14 Defendant.  
 15

16  
 17 Plaintiff Iguacu, Inc. (“Iguacu”) and Defendant Antonio Cabrera Mano Filho (“Mr. Cabrera”) jointly request that the Further Case Management Conference currently set for Thursday, January 13, 2011, be continued to April 7, 2011, for the following reasons:

20 1. On October 7, 2010, the Court issued a Case Management Scheduling Order referring the case to a Magistrate Judge for a Settlement Conference. The Court ordered that the settlement conference had to be completed no later than ninety days from the entry of the Court’s order. [Dkt. No. 95.] The Court also set a Further Case Management Conference for January 13, 2011.

24 2. On December 13, 2010, the parties filed an Amended Joint Application to Continue the Settlement Conference, which was scheduled for December 23, 2010. [Dkt. No. 109]. On December 14, 2010, the Court extended the time for the parties to complete the settlement conference to April 1, 2011 pursuant to the parties’ stipulated request. [Dkt. No. 110]. On December 15, 2010, Honorable Magistrate Judge Bernard Zimmerman continued the Settlement Conference from

1 December 23, 2010 to March 17, 2011 pursuant to the Joint Application of the parties. [Dkt. No.  
2 113].

3 3. Iguacu is currently not in a position to analyze the value of its claims for settlement  
4 purposes, and does not expect to be able to do so until mid-February 2011 at the earliest.  
5 Additionally, the parties will be in a better position to determine their respective subsequent steps in  
6 this litigation following the March 17, 2011 settlement conference.

7 4. Accordingly, because the Further Case Management Conference is much more likely  
8 to be productive following the Settlement Conference, the parties respectfully request that the Further  
9 Case Management Conference currently scheduled for January 13, 2011 be continued to April 7,  
10 2011 at 10:00 a.m.

11 IT IS SO STIPULATED.

12  
13 K&L GATES LLP

14 Dated: December 22, 2010

15 By: /s/ Claudia A. Quiroz

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20 Attorneys for Defendant ANTONIO  
21 CABRERA MANO FILHO

22 SIDEMAN & BANCROFT, LLP

23 Dated: December 22, 2010

24 By: /s/ Robert R. Cross

25 Robert R. Cross  
26 rcross@sideman.com  
27 Attorney for Plaintiff IGUACU, INC.  
28

1 **ECF ATTESTATION**

2 I, Claudia A. Quiroz, attest that concurrence in e-filing this **STIPULATION AND**  
3 **[PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE FROM**  
4 **JANUARY 13, 2011 TO APRIL 7, 2011**, has been obtained from signatory Robert R. Cross, in  
5 compliance with General Order 45, X.B.

6 K&L GATES LLP

7  
8 Dated: December 22, 2010

By: /s/ Claudia A. Quiroz

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13 Attorneys for Defendant ANTONIO  
14 CABRERA MANO FILHO

15 **~~[PROPOSED]~~ ORDER**

16 Pursuant to the Stipulation of counsel and for good cause shown, IT IS HEREBY  
17 ORDERED that the Case Management Conference currently set for January 13, 2011 is continued to  
18 at 10:00 a.m.  
19 April 7, 2011. The parties shall submit their Joint Case Management Statement at least one week  
20 prior to the Conference

21 **IT IS SO ORDERED.**

22  
23 Dated: December 22, 2010

By: 

24 Honorable Richard Seeborg  
25 UNITED STATES DISTRICT JUDGE