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6 Attorneys for Plaintiffs
 7 SANRIO COMPANY, LTD. and SANRIO, INC.

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11
 12 SANRIO COMPANY, LTD., a Japanese
 corporation and SANRIO, INC., a California
 13 corporation,

14 Plaintiffs,

15 vs.

16 J.I.K. Accessories, Inc., Accessitive
 Accessories, Inc., B.B. Apparels Inc., Amuseco
 17 Accessories, Inc., Nana Accessory, Inc., Seanna
 Corporation, Heiress Enterprises, Inc., Pinkland
 Corporation, Inc., Bliss, Final Choice, Joon Sik
 18 Bae, Yong Woo Kim, Any Bae, Jason Bae,
 Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha
 19 Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,
 Sukmin Bae, John Bae, Lisa Bae, Grace Kim,
 20 Ken Chung, Yeun Sik Cha, Debbie Kim, DOES
 1- 10,

21 Defendants

Civil Action No. C 09-00440 MHP

STIPULATION TO EXTEND
 DISCOVERY DEADLINES;
 [PROPOSED] ORDER

22
 23 Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and
 24 defendants that currently remain in the case respectfully submit this stipulation requesting an
 25 extension of time for discovery and other dates as follows.
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1 WHEREAS, the current trial date is in August 2011 and none of the changes in
2 deadlines set forth herein will impact that date;

3 WHEREAS, the undersigned parties participated in mediation on August 25, 2010;

4 WHEREAS, during the mediation, Plaintiffs' claims against four defendants were
5 settled (namely, Sukmin Bae, Lisa Bae a/k/a/ Hyang Hee Bae, and their two unincorporated
6 businesses called "Bliss" and "Final Choice") (the "Sukmin Bae Defendants").

7 Documentation of that settlement is in progress and the appropriate documents will be filed
8 with the Court in due course;

9 WHEREAS, Plaintiffs and defendants J.I.K Accessories, Inc., Accessitive
10 Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae a/k/a/ Jason
11 Bae, Andy Bae, and Brian Bae) (collectively, the "Joon Sik Bae Defendants") made progress
12 during the mediation and have agreed to continue negotiations and to engage in further
13 mediation, if necessary, in good faith efforts to reach settlement;

14 WHEREAS, Defendants John Bae, Aeran Bae a/k/a Chris Bae, and their two
15 unincorporated businesses called "Bliss" and "Final Choice" (collectively, the "John Bae
16 Defendants") are **newly** involved in the action (by stipulated order dated August 24, 2010, the
17 entry of default filed against them on December 2, 2010 was set aside, and the John Bae
18 Defendants filed their Answer on or about September 3, 2010;

19 WHEREAS, the current deadline to complete fact discovery is October 15, 2010;

20 WHEREAS, on July 15, 2010, Plaintiffs, the Sukmin Bae Defendants and the Joon Sik
21 Bae Defendants filed one prior stipulation and request to extend discovery dates, under which
22 the parties agreed that any formal discovery served prior to the mediation date shall be stayed,
23 and deemed served on the day after the final date that mediation is completed;

24 WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as
25 requested herein would increase the likelihood of a successful settlement because the parties would
26 not need to expend additional resources for discovery while settlement negotiations are ongoing;

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Date: September 9, 2010

By: /s/ Noel M. Cook
NOEL M. COOK
LINDA JOY KATTWINKEL
Attorneys for Plaintiffs
SANRIO COMPANY, LTD., and SANRIO, INC.

BLEDSON, CATHCART, DIESTEL,
PEDERSEN & TREPPA, LLP

Date: September 9, 2010

By: /s/ L. Jay Pedersen
L. JAY PEDERSEN
JOSHUA N. ROSEN
Attorneys for Defendant
ACCESSITIVE ACCESSORIES, INC.

TINGLEY PIONTKOWSKI LLP

Date: September 9, 2010

By: /s/ Bruce Pointkowski
BRUCE C. POINTKOWSKI
JONATHAN A. MCMAHON
Attorney for Defendants
J.I.K. ACCESSORIES, INC.
ACCESSITIVE ACCESSORIES, INC.
B.B. APPARELS INC.
AMUSECO ACCESSORIES, INC.
JOON SIK BAE, ANDY BAE, and BRIAN BAE

S. CALVIN MYUNG

Date: September 9, 2010

By: /s/ S. Calvin Myung
S. CALVIN MYUNG
Attorney for Defendants
SUKMIN BAE, AND HYANG HEE BAE,
DBA BLISS AND FINAL CHOICE

LEACH AND MCGREEVY

Date: September 9, 2010

By: /s/ Richard E. McGreevy
RICHARD E. MCGREEVY
BRIAN LEACH
Attorney for Defendants
JOHN BAE AND AERON BAE,

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IT IS SO ORDERED

Dated: 9/10, 2010.

MARILYN H. PATEL
U.S. DISTRICT JUDGE

