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12 Attorneys for Plaintiffs
 13 SANRIO COMPANY, LTD. and SANRIO, INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 SANRIO COMPANY, LTD., a Japanese
 17 corporation and SANRIO, INC., a California
 18 corporation,

19 Plaintiffs,

20 vs.

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

Defendants

Civil Action No. C 09-00440 MHP

STIPULATION TO EXTEND
 DISCOVERY DEADLINES;
~~PROPOSED~~ ORDER

Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. (“Plaintiffs”) and
 defendants that currently remain in the case respectfully submit this stipulation requesting an
 extension of time for discovery and other dates as follows.

1 WHEREAS, the undersigned parties participated in mediation on August 25, 2010,
2 during which significant progress was made toward settlement;

3 WHEREAS, on September 10, 2010, this Court granted the parties' stipulation to stay
4 discovery until November 15, 2010, and to extend discovery deadlines to give the parties time
5 to continue settlement negotiations;

6 WHEREAS, the current deadline to complete fact discovery is February 28, 2011;

7 WHEREAS, the parties have been working diligently with the mediator to set a date
8 for continued mediation, but certain insurance carriers for defendants have been unable or
9 unwilling to agree to any of the mediation dates proposed so far;

10 WHEREAS, a new mediation session, with at least some of the parties, has been
11 tentatively scheduled for February 28, 2011;

12 WHEREAS, the parties have served some discovery requests, and certain defendants
13 have requested additional time to respond thereto;

14 WHEREAS, plaintiffs are willing to extend the deadlines for defendants' discovery
15 responses, but would need additional time for follow-up discovery and depositions once
16 defendants' responses are received (if the case does not settle);

17 WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as
18 requested herein would increase the likelihood of scheduling a second mediation and reaching a
19 successful settlement;

20 WHEREAS, counsel for all of the parties request that discovery and other deadlines be
21 extended accordingly;

22 NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby
23 stipulate and request the Court to order as follows:

24 1. Discovery and other deadlines shall be extended, with the new deadlines to be as
25 follows:

26 Last day to serve fact discovery: April 29, 2011
27

1 Expert disclosure: April 29, 2011
 2 Rebuttal expert reports due: May 16, 2011
 3 Last day to serve expert discovery: June 29, 2011
 4 Dispositive motions hearing: ~~September 8, 2011~~ September 12, 2011 @ 2:00 p.m.
 5 Trial: ~~October 10, 2011~~ or as soon thereafter as the
 6 October 11, 2011 at 8:30 a.m.
 Court's calendar permits.

7 IT IS SO STIPULATED.

8 OWEN, WICKERSHAM & ERICKSON, P.C.

9 Date: January 26, 2011

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

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 12
 13
 14 BLEDSON, CATHCART, DIESTEL,
 PEDERSEN & TREPPA, LLP

15 Date: January 26, 2011

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

17
 18
 19 TINGLEY PIONTKOWSKI LLP

20 Date: January 26, 2011

21 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

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LEACH AND MCGREEVY

Date: January 26, 2011

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

IT IS SO ORDERED

Dated: January 27 , 2011.

HON. MARILYN
U.S. DISTRICT



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