11				
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7	Attorneys for Plaintiffs SANRIO COMPANY, LTD. and SANRIO, INC.			
8				
9	UNITED STATES DISTRICT COURT			
10	NORTHERN DISTRICT OF CALIFORNIA			
11				
12	SANRIO COMPANY, LTD., a Japanese	Civil Action No. C 09-00440 MHP		
13	corporation and SANRIO, INC., a California corporation,	CIVII ACUOII NO. C 09-00440 WITT		
14	Plaintiffs,	STIPULATION TO EXTEND DISCOVERY DEADLINES;		
15	VS.	[PROPOSED] ORDER		
16	J.I.K. Accessories, Inc., Accessitive			
17	Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Nana Accessory, Inc., Seanna Comporation, Heiross Enterprises, Inc., Pinkland			
18	Corporation, Heiress Enterprises, Inc., Pinkland Corporation, Inc., Bliss, Final Choice, Joon Sik Bae, Yong Woo Kim, Any Bae, Jason Bae,			
19	Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,			
20	Sukmin Bae, John Bae, Lisa Bae, Grace Kim, Ken Chung, Yeun Sik Cha, Debbie Kim, DOES			
21	1- 10,			
22	Defendants			
23				
24	Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and			
25	defendants that currently remain in the case respectfully submit this stipulation requesting an			
26	extension of time for discovery and other dates as follows.			
27	WHEREAS, plaintiffs and defendants J.I.K. Accessories, Inc., Accessitive			
28	STIPULATION AND [PROPOSED] ORDER 1 TO EXTEND DISCOVERY DEADLINE	C 09-00440 MHP		

Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae, Andy Bae and Brian Bae (the "Joon Sik Bae Defendants") participated in further mediation on February 28, 2010, subsequently agreed to settlement terms, and are currently finalizing their settlement documents;

WHEREAS, plaintiffs and the remaining undersigned defendants John Bae, Lisa Bae, Bliss and Final Choice (the "John Bae Defendants") are in active settlement discussions and expect to be able to settle without expending resources on further discovery;

WHEREAS, on January 27, 2011, this Court granted the parties' stipulation to extend discovery deadlines to give the parties time to continue settlement negotiations;

WHEREAS, the current deadline to complete fact discovery is April 29, 2011;

WHEREAS, the Joon Sik Bae Defendants and the John Bae Defendants have requested additional time to respond to plaintiffs' outstanding discovery requests;

WHEREAS, plaintiffs are willing to extend the deadlines for defendants' discovery responses, but would need additional time for follow-up discovery and depositions once defendants' responses are received (if the claims against these defendants are not settled);

WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as requested herein would increase the likelihood of reaching a successful settlement;

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

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

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

Last day to serve fact discovery: June 30, 2011

Expert disclosure: June 30, 2011

Rebuttal expert reports due: July 30, 2011

Last day to serve expert discovery: August 30, 2011

1		Dispositive motions hearing:		17 October 17, 2011 at 2:00 p.m.
2		Trial:		November 15, 2011 at 8:30 p.m. or as soon
3				thereafter as the Court's calendar permits.
4		IT IS SO STIPULATED.		morounies un cita court à currentum permité.
		II IS SO SIII CLAILD.		
5				OWEN, WICKERSHAM & ERICKSON, P.C.
6	Date:	April 26, 2011	Rv·	/s/ Noel M. Cook
7	Date.	11piii 20, 2011	Бу	NOEL M. COOK
8				LINDA JOY KATTWINKEL
0				Attorneys for Plaintiffs SANRIO COMPANY, LTD., and SANRIO, INC.
9				STANCE COMPANY, ETD., and STANCE, INC.
10				
11				BLEDSOE, CATHCART, DIESTEL,
				PEDERSEN & TREPPA, LLP
12	Date:	April 26, 2011	By:	/s/ L. Jay Pedersen
13		•	·	L. JAY PEDERSEN
14				JOSHUA N. ROSEN
14				Attorneys for Defendant ACCESSITIVE ACCESSORIES, INC.
15				ACCESSITIVE ACCESSORIES, IIVC.
16				TINGLEW NOVEWOWSKILLE
17				TINGLEY PIONTKOWSKI LLP
	Date:	April 26, 2011	By:	/s/ Bruce Pointkowski
18				BRUCE C. POINTKOWSKI JONATHAN A. MCMAHON
19				Attorney for Defendants
				J.I.K. ACCESSORIES, INC.
20				ACCESSITIVE ACCESSORIES, INC.
21				B.B. APPARELS INC.
				AMUSECO ACCESSORIES, INC. JOON SIK BAE, ANDY BAE, and BRIAN BAE
22				JOON SIX DAL, AND I DAL, and DRIAN DAL
23				
24				LEACH AND MCGREEVY
	Date:	April 26, 2011	By:	/s/ Richard E. McGreevy
25				RICHARD E. MCGREEVY
26				BRIAN LEACH
27				Attorney for Defendants JOHN BAE AND AERON BAE,
27				DBA BLISS AND FINAL CHOICE
28		ATION AND [PROPOSED] ORDER END DISCOVERY DEADLINE		3 C 09-00440 MHP

TO EXTEND DISCOVERY DEADLINE

IT IS SO ORDERED

Dated: __4/28______, 2011.



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