

1 NOEL M. COOK, SBN 122777  
 LINDA JOY KATTWINKEL, SBN 164283  
 2 ALICA DEL VALLE, SBN 246006  
 OWEN, WICKERSHAM & ERICKSON, P.C.  
 3 455 Market Street, Suite 1910  
 San Francisco, California 94105  
 4 (415) 882-3200 Tel  
 (415) 882-3232 Fax  
 ncook@owe.com  
 5 ljk@owe.com  
 adelvalle@owe.com  
 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  
 13 corporation and SANRIO, INC., a California  
 corporation,  
 14  
 Plaintiffs,  
 15  
 vs.  
 16  
 J.I.K. Accessories, Inc., Accessitive  
 17 Accessories, Inc., B.B. Apparels Inc., Amuseco  
 Accessories, Inc., Nana Accessory, Inc., Seanna  
 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

Civil Action No. C 09-00440 MHP  
 STIPULATION TO EXTEND  
 DISCOVERY DEADLINES;  
 [PROPOSED] ORDER

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

1 Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae, Andy Bae  
2 and Brian Bae (the “Joon Sik Bae Defendants”) participated in further mediation on February  
3 28, 2010, subsequently agreed to settlement terms, and are currently finalizing their settlement  
4 documents;

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

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

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

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

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

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

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

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

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

24 Last day to serve fact discovery: June 30, 2011

25 Expert disclosure: June 30, 2011

26 Rebuttal expert reports due: July 30, 2011

27 Last day to serve expert discovery: August 30, 2011

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dispositive motions hearing:

October 14, 2011 at 2:00 p.m.

Trial:

November 15, 2011 at 8:30 p.m. or as soon thereafter as the Court's calendar permits.

IT IS SO STIPULATED.

OWEN, WICKERSHAM & ERICKSON, P.C.

Date: April 26, 2011

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: April 26, 2011

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

TINGLEY PIONTKOWSKI LLP

Date: April 26, 2011

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

LEACH AND MCGREEVY

Date: April 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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED**

Dated: 4/28, 2011.

HON. MARILYN HALL PATEL  
U.S. DISTRICT COURT



S:\1Clients\SANRILITIGA\70017\Pleadings\Stipulation To Extend Discovery Deadline 4-20-11.doc