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6 Attorneys for Plaintiff
7 PERDANA CAPITAL (LABUAN) INC.
A Malaysian Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

12 PERDANA CAPITAL (LABUAN) INC., a) Case No.: CV-09-1479 PJH
Malaysian corporation,)
13 Plaintiff,) Assigned to Hon. Phyllis J. Hamilton
14 vs.)
15 MOHAMMAD AKRAM CHOWDRY, an) **STIPULATION TO CONTINUE
16 individual; HI-TECH VENTURE
17 PARTNERS, LLC, a Delaware Limited
18 Liability Company; HI-TECH ASSOCIATES,
a California Limited Liability Company; and
DOES 1-50,) **SEPTEMBER 10, 2009 INITIAL CASE
19 Defendants.) **MANAGEMENT CONFERENCE AND
20 RELATED DATES******

21 **WHEREAS**, the Initial Case Management Conference in this matter is currently
22 scheduled for September 10, 2009 at 2:30 p.m. in Courtroom 3 of the Northern District of
23 California, pursuant to the Stipulation to Continue July 16, 2009 Initial Case Management
24 Conference and Related Dates, signed by the Court on June 25, 2009;

25 **WHEREAS**, the current case management schedule requires the Parties to file their Rule
26 26(f) Report, complete their initial disclosures, and file a Joint Case Management Conference
27 Statement no later than September 3, 2009;

1 **WHEREAS**, the Parties are scheduled to participate in an ADR Phone Conference on
2 September 3, 2009, at 10:00 a.m. pursuant to the Notice of Need for ADR Phone Conference
3 filed on August 20, 2009;

4 **WHEREAS**, pursuant to Local Rule 16-2(d), a party may seek relief from the Case
5 Management Schedule upon a motion that (1) describes the circumstances which support the
6 request; (2) affirms that counsel for the moving party has conferred with all other counsel in an
7 effort to reach agreement about the matter and reports whether the other counsel supports or
8 opposes the request for relief; (3) is accompanied by a proposed revised case management
9 schedule; and (4) indicates any changes required in the ADR process or schedule in the case;

10 **WHEREAS**, the Parties have been working cooperatively in efforts they hope may
11 facilitate resolution of this matter;

12 **WHEREAS**, notwithstanding such efforts, the Parties also require additional time to
13 gather documents and identify potential witnesses, and, as to Plaintiff, calculate its damages in
14 compliance with the disclosure requirements of Rule 26(a);

15 **WHEREAS**, it is the Parties' understanding that the Court will be dark for the first three
16 weeks of October 2009 and that the next available date for the Initial Case Management
17 Conference is Thursday, November 5, 2009;

18 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the
19 undersigned Parties, as follows:

20 1. That the hearing date for the Initial Case Management Conference shall be
21 scheduled for **Thursday, November 5, 2009**, at 2:30 p.m., in Courtroom 3, 17th Floor of the
22 Northern District;

23 2. That the last day for Parties to file the Rule 26(f) Report, complete initial
24 disclosures or state objection in Rule 26(f) Report, and file their Case Management Statement per
25 the Court's Standing Order re Contents of Joint Case Management Statement shall be **Thursday,**
26 **October 29, 2009.**

1 3. That should the Court execute this Stipulation, defendants in this matter will
2 contact the ADR Office of the Northern District and inform the ADR Office that the September
3 3, 2009 phone conference should be rescheduled for a future date in accordance with the revised
4 Case Management Conference schedule.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: August 28, 2009

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

By: /s/ Joseph Kouri

Joseph Kouri

Atorneys for Plaintiff

PERDANA CAPITAL (LABUAN) INC.

A Malaysian Corporation

Respectfully submitted,

DATED: August 28, 2009

LAW OFFICES OF MICHAEL Q. EAGAN

By: Michael O'Egan / Mac

Michael Q. Eagan

Attorneys for Defendants

MOHAMMAD AKRAM CHOWDRY, HI-TECH

VENTURE PARTNERS, LLC; and HI-TECH

ASSOCIATES

20 I, Joseph Kouri, am the ECF User whose ID and password are being used to file this ADR
21 Certification by Parties and Counsel. In compliance with General Order 45, X.B., I hereby attest
22 that Michael O. Eagan has concurred in this filing.

24 | DATED: August 28, 2009

By: /s/ Joseph Kouri

Joseph Kouri (State Bar No. 133804)

jkouri@kdvglaw.com

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 DATED: August 31, 2009

3 UNITED STATES DISTRICT COURT
4 NORTHERN DISTRICT OF CALIFORNIA

5 By: _____

6 The Honorable Phyllis J. Hamilton



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STIPULATION TO CONTINUE SEPTEMBER 10, 2009 INITIAL CASE MANAGEMENT
CONFERENCE AND RELATED DATES
Case No.: CV-09-1479 PJH