

1 WILLIAM J. GOINES (SBN: 061290)  
 2 KAREN ROSENTHAL (SBN: 209419)  
 3 GREENBERG TRAUERIG, LLP  
 1900 University Avenue, Fifth Floor  
 4 East Palo Alto, California 94303  
 Telephone: (650) 328-8500  
 Facsimile: (650) 328-8508  
goinesw@gtlaw.com  
rosenthalk@gtlaw.com

6 THOMAS D. BROOKS (Admitted *Pro Hac Vice*)  
 SPERLING & SLATER, P.C.  
 7 55 West Monroe, Suite 3200  
 Chicago, IL 60603  
 8 Telephone: (312) 641-3200  
 Facsimile: (312) 641-6492  
tdbrooks@sperling-law.com

10 Attorneys for Plaintiffs GEM ACQUISITIONCO, LLC and  
 GEM REALTY FUND IV, L.P

11 KENNETH A. KUWAYTI (SBN 145384)  
 12 kkuwayti@mofa.com  
 MORRISON & FOERSTER LLP  
 13 755 Page Mill Road  
 Palo Alto, California 94304-1018  
 14 Telephone: (650) 813-5600  
 Facsimile: (650) 494-0792

15 Attorneys for Defendants SORENSON GROUP HOLDINGS,  
 16 LLC, JAMES L. SORENSON, JOSEPH SORENSON, and  
 TIMOTHY FENTON

17  
 18 IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 19 SAN FRANCISCO DIVISION

20 GEM ACQUISITIONCO, LLC, and GEM  
 REALTY FUND IV, L.P.,

21 Plaintiffs;

22 v.

23 SORENSON GROUP HOLDINGS, LLC,  
 JAMES L. SORENSON, JOSEPH  
 24 SORENSON, TIMOTHY FENTON, and  
 DOES 1-25, inclusive,

25 Defendants.

Case No. C 09-1484-SI

**STIPULATED REQUEST FOR ORDER  
 ENLARGING TIME PURSUANT TO CIV.  
 L.R. 6-2**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate to the following  
2 request for an extension of the current case schedule:

3 WHEREAS this case was removed to this Court on April 3, 2009 and has been pending for  
4 just over a year;

5 WHEREAS the case is currently set for a bench trial to commence on August 30, 2010,  
6 with a fact discovery cut-off of May 28, 2010;

7 WHEREAS the parties have recently stipulated pursuant to Fed. R. Civ. P. 30(a) to the  
8 taking of three additional fact-witness depositions per side (i.e., a total of 13 fact-witness  
9 depositions per side);  
10

11 WHEREAS the parties expect to complete these depositions by mid-June 2010;

12 WHEREAS the parties have agreed to a schedule extending pretrial deadlines to  
13 accommodate these additional depositions that will not impact the trial date set in this case;  
14

15 WHEREAS the parties have previously requested two modifications of time from the  
16 Court, one of which was granted on December 18, 2009, and the other of which was granted on  
17 April 2, 2010;

18 WHEREAS the Court, in modifying the schedule on April 2, set a trial date two weeks later  
19 than the trial date proposed by the parties, but accepted the other pre-trial dates proposed by the  
20 parties;  
21

22 THEREFORE, for the reasons set forth more fully in the accompanying declaration of  
23 Thomas D. Brooks, the parties request the entry of the proposed order, attached as Exhibit A.  
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2 Dated: May 27, 2010

Respectfully Submitted,

3 By: /s/ Thomas D. Brooks  
4 THOMAS D. BROOKS (*Pro Hac Vice*)  
5 SPERLING & SLATER, P.C.  
6 55 West Monroe, Suite 3200  
7 Chicago, IL 60603  
8 Telephone: (312) 641-3200  
9 Facsimile: (312) 641-6492

10 WILLIAM J. GOINES (SBN: 061290)  
11 KAREN ROSENTHAL (SBN: 209419)  
12 CINDY HAMILTON (SBN: 217951)  
13 GREENBERG TRAUIG, LLP  
14 1900 University Avenue, Fifth Floor  
15 East Palo Alto, California 94303  
16 Telephone: (650) 328-8500  
17 Facsimile: (650) 328-8508

18 Attorneys for Plaintiffs GEM ACQUISITIONCO,  
19 LLC and GEM REALTY FUND IV, L.P.

20 By: /s/Kenneth A. Kuwayti

21 KENNETH A. KUWAYTI (CA SBN 145384)  
22 CHRISTOPHER L. ROBINSON (CA SBN 260778)  
23 COLETTE R. VERKUIL (CA SBN 263630)  
24 MORRISON & FOERSTER LLP  
25 755 Page Mill Road  
26 Palo Alto, California 94304-1018  
27 Telephone: 650.813.5600  
28 Facsimile: 650.494.0792

Attorneys for Defendants SORENSON GROUP  
HOLDINGS, LLC, JAMES L. SORENSON,  
JOSEPH SORENSON AND TIMOTHY FENTON

1 ATTESTATION CLAUSE

2 I, Thomas D. Brooks, am the ECF user whose ID and password are being used to file this  
3 STIPULATED REQUEST FOR ORDER ENLARGING TIME PURSUANT TO CIV. L.R. 6-2.

4 In compliance with General Order 45, X.B., I hereby attest that Kenneth A. Kuwayti of Morrison  
5 & Forester LLP, acting on behalf of Sorenson, has concurred in this filing.  
6

7 Dated: May 27, 2010

SPERLING & SLATER, P.C.

8 By: /s/Thomas D. Brooks

9 Thomas D. Brooks  
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1 WILLIAM J. GOINES (SBN: 061290)  
2 KAREN ROSENTHAL (SBN: 209419)  
3 GREENBERG TRAUERIG, LLP  
4 1900 University Avenue, Fifth Floor  
5 East Palo Alto, California 94303  
6 Telephone: (650) 328-8500  
7 Facsimile: (650) 328-8508  
8 [goinesw@gtlaw.com](mailto:goinesw@gtlaw.com)  
9 [rosenthalk@gtlaw.com](mailto:rosenthalk@gtlaw.com)

6 THOMAS D. BROOKS (*Pro Hac Vice*)  
7 SPERLING & SLATER, P.C.  
8 55 West Monroe, Suite 3200  
9 Chicago, IL 60603  
10 Telephone: (312) 641-3200  
11 Facsimile: (312) 641-6492  
12 [tdbrooks@sperling-law.com](mailto:tdbrooks@sperling-law.com)

10 Attorneys for Plaintiffs GEM  
11 ACQUISITIONCO, LLC and GEM  
12 REALTY FUND IV, L.P.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

14 GEM ACQUISITIONCO, LLC, and GEM  
15 REALTY FUND IV, L.P.,

16 Plaintiffs,

17 v.

18 SORENSON GROUP HOLDINGS, LLC,  
19 JAMES L. SORENSON, JOSEPH  
20 SORENSON, TIMOTHY FENTON, and  
21 DOES 1-25, inclusive,

22 Defendants.

Case No. CV 09-1484 SI

**[PROPOSED] ORDER ENLARGING  
TIME PURSUANT TO CIV. L.R. 6-2**

22 This matter comes before the Court on parties' Stipulated Request for Order Enlarging  
23 Time Pursuant to Civ. L.R. 6-2. Having considered the arguments and evidence submitted and  
24 for good cause appearing:

25 IT IS SO ORDERED THAT the schedule in this case shall be extended as follows:

26 EXHIBIT A  
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Event	Current Date	Amended Date
Fact discovery cutoff	05/28/2010	06/18/2010
Expert disclosures	05/07/2010	NO CHANGE
Rebuttal expert disclosures	06/04/2010	<del>06/25/2010</del> 6/4/10
Expert discovery cutoff	07/02/2010	<del>07/23/2010</del> 7/1/10
Dispositive motions	06/11/2010	<del>07/02/2010</del> 6/18/10
Oppositions to dispositive motions	06/25/2010	<del>07/16/2010</del> 7/2/10
Replies to dispositive motions	07/02/2010	<del>07/23/2010</del> 7/9/10
Dispositive motion hearing	07/16/2010	<del>08/06/2010</del> 7/23/10
Pretrial conference	08/03/2010	<del>08/17/2010</del> 8/24/10
Trial	08/30/2010	NO CHANGE

Dated: \_\_\_\_\_

THE HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE