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A limited liability partnership formed in the State of Delaware

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7 Attorneys for Defendants,  
 Bank of America, N.A., sued erroneously as  
 8 Bank of America Corporation

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

11 EFORCE GLOBAL, INC.,  
 12 Plaintiff,  
 13 vs.  
 14 BANK OF AMERICA CORPORATION, et al,  
 and Does 1 - 100,  
 15 Defendants.

Civil Action No. CV-091984-SC  
**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DISCOVERY  
 DEADLINES**  
*Hon. Samuel Conti*

17 Plaintiff eForce Global, Inc. (“eForce”) and defendant Bank of America, N.A. (“Bank of  
 18 America”), by and through their respective attorneys, stipulate and agree as follows:

- 19 1. This Court has set the discovery cutoff date for this case as May 26, 2010, pursuant to  
 20 its Status Conference Order, dated August 28, 2009.
- 21 2. Both eForce and Bank of America (collectively, the “Parties”) have diligently  
 22 participated in discovery and mediation efforts in this action.
- 23 3. The parties participated in mediation in November, 2009, but were unsuccessful in  
 24 reaching a resolution to the case. Subsequently, eForce obtained new counsel, and the parties have  
 25 been working to schedule and conduct over 15 depositions, many of them involving out-of-state  
 26 witnesses. One witness who resides in Hong Kong and must travel to the United States for his  
 27 deposition has limited availability.

