

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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Attorneys for Plaintiff
General Electric Capital Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GENERAL ELECTRIC CAPITAL CORPORATION, a Delaware corporation,

Plaintiff,

vs.

MASTER KRAFT MACHINING INC., a California corporation; and KURT T. MATSUDA, a citizen and resident of California,

Defendants.

No.: C 09-02854 SI
STIPULATED REQUEST FOR ORDER CHANGING TIME

Honorable Susan Illston

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1 Pursuant to Civil Local Rule 6-2, Plaintiff, GENERAL ELECTRIC CAPITAL
2 CORPORATION, and Defendants, MASTER KRAFT MACHINING, INC. and KURT T.
3 MATSUDA (collectively, the "Parties"), by and through their respective counsel of record whose
4 signatures appear below, HEREBY STIPULATE AS FOLLOWS:

5 1. The Parties respectfully request that the Hearing on Plaintiff's Motion for Summary
6 Judgment be continued from March 26, 2010, 9 a.m. to **April 9, 2010, 9 a.m.**

7 2. The Parties also respectfully request the deadline for expert designations be continued
8 from March 26, 2010 to **April 9, 2010** and the deadline for rebuttal expert designations be continued
9 from March 31, 2010 to **April 16, 2010.**

10 3. These requests are made on the grounds that a short continuance of the motion
11 hearing and the deadline for expert and rebuttal expert designation will allow the parties to devote all
12 their resources to continued settlement negotiations. At the January 29, 2010 status conference, the
13 Court indicated that a business solution may be available for this case and recommended that the
14 Parties explore such a solution. Since the status conference, circumstances related to Defendants'
15 business have changed, presenting an opportunity for a business solution to this dispute. The Parties
16 have been and continue to diligently work towards settling this matter. Significant progress has been
17 made, with draft settlement agreements being circulated for review and signature. The Parties
18 believe they are close to settling this matter.

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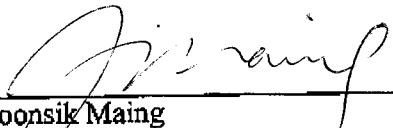
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4. Accordingly, the Parties respectfully request a continuance of the motion hearing from March 26, 2010, 9 a.m., to April 9, 2010, 9 a.m.; expert designation deadline from March 26, 2010 to April 9, 2010; and the rebuttal expert designation deadline from March 31, 2010 to April 16, 2010.

IT IS SO STIPULATED.

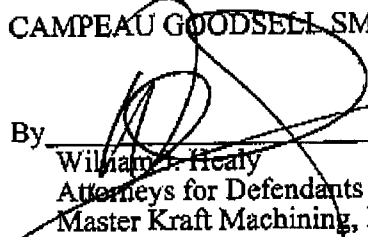
DATED: March 24, 2010

REED SMITH LLP

By 
Joonsik Maing
Attorneys for Plaintiff
General Electric Capital Corporation

DATED: March 24, 2010

CAMPEAU GOODSELL SMITH, L.C.

By 
William F. Healy
Attorneys for Defendants
Master Kraft Machining, Inc. and Kurt T. Mastuda

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March __, 2010



Honorable Susan Illston
United States District Court Judge

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