WHEREAS, the parties agreed to expedited scheduling of this lawsuit such that fact discovery closes on September 3, 2010, dispositive motions are due no later than October 8, 2010, and a trial would be held on December 20, 2010;

WHEREAS, the parties agreed to attend a Settlement Conference with a magistrate judge substantially prior to the deadline for filing dispositive motions;

WHEREAS, Magistrate Judge Zimmerman scheduled a Settlement Conference for August 31, 2010;

WHEREAS, plaintiff Squire, Sanders & Dempsey L.L.P. ("SSD") noticed Mr. Takieddine's deposition to take place a day prior to the scheduled Settlement Conference on August 30, 2010, to take advantage of Mr. Takieddine's attendance of the Settlement Conference;

WHEREAS, counsel for defendant Ziad Takieddine notified Mr. Takieddine on August 25, 2010, that he will move to withdraw as counsel for Mr. Takieddine;

NOW, THEREFORE, THE PARTIES, THROUGH THEIR COUNSEL, STIPULATE AS FOLLOWS:

The Settlement Conference, which is currently scheduled for August 31, 2010, shall be reset to the first available and mutually convenient date after defense counsel's motion is heard and ruled upon, but in no event shall be later than October 1, 2010. Should Mr. Takieddine not appear for his scheduled deposition on August 30, 2010, SSD shall be entitled to take Mr. Takieddine's deposition up to October 8, 2010 notwithstanding the current fact discovery cut-off date. Other than Mr. Takieddine's deposition, no other fact discovery shall be permitted after the date currently set for the close of fact discovery.

1	It is so stipulated:	
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3	DATED: August, 2010	SQUIRE, SANDERS & DEMPSEY LLP
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5		By: /S Joseph A. Meckes
6		Joseph A. Meckes
7	DATED: August, 2010	HINSHAW & CULBERTSON LLP
8	DiffED. Hagast, 2010	III(SIIII) & COLDENISON EDI
9		By:/S
10		David L. Winnett Attorneys for Defendant
11		Ziad Takieddine
12	IT IS SO ORDERED:	
13	DATED: March, 2010	By: Juran Selaton
14	, 2010	Susan Illston
16		Judge of the United States District Court
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28	STIPLII ATION TO RESCHEDIT	3 LE SETTLEMENT CONFERENCE AND PROPOSED ORDER
	2996598v1 908801 72690	Case No. CV 09 3699 SI