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Attorneys for Defendant,  
 John Thomas Financial Corporation

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION**

BLINGLET, INC., a Delaware corporation,

Plaintiff,

vs.

AMBER ALERT SAFETY CENTERS, INC., a  
 Nevada corporation; KAI D. PATTERSON;  
 GALAXY MEDIA AND MARKETING  
 CORPORATION, a successor to Amber Alert  
 Safety Centers, Inc.; JOHN THOMAS  
 FINANCIAL CORPORATION; JOHN  
 THOMAS BRIDGE AND OPPORTUNITY  
 FUND; and JOHN DOES 1-100,

Defendants.

Case No. C 09-05156 SI

**STIPULATION EXTENDING TIME  
 FOR DEFENDANTS TO RESPOND  
 TO AMENDED COMPLAINT,  
 EXTENDING NON-EXPERT  
 DISCOVERY CUTOFF, AND  
 CONTINUING CASE  
 MANAGEMENT CONFERENCE AND  
 HEARING ON PATTERSON'S  
 MOTION TO DISMISS ELEVENTH  
 CLAIM**

This STIPULATION is entered into this 18<sup>th</sup> day of August 2010 between and among  
 Plaintiff Blinglet, Inc. ("Plaintiff"), Kai D. Patterson ("Patterson"), Amber Alert Safety Centers,  
 Inc. ("Amber"), and John Thomas Financial Corporation ("JTFC"), by and through their  
 undersigned counsel of record, with reference to the following:

WHEREAS, Plaintiff filed an Amended Complaint on or about June 7, 2010, adding  
 JTFC as a party to the within action, for which a response was due on or before July 19, 2010;

STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED  
 COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING  
 CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO  
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Page 1

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1 WHEREAS, Plaintiff previously agreed and stipulated to an extension of time for JTFC  
2 to answer or otherwise respond to the Amended Complaint, on or before August 2, 2010;

3 WHEREAS, counsel for JTFC requested and Plaintiff does not object to providing JTFC  
4 with an additional extension of time to answer or otherwise respond to the Amended Complaint,  
5 through and including August 31, 2010;

6 WHEREAS, newly appointed counsel for Amber requested and Plaintiff does not object  
7 to providing Amber with an extension of time to answer or otherwise respond to the Amended  
8 Complaint, through and including August 31, 2010;

9 WHEREAS, the additional time agreed upon by the parties will not otherwise delay  
10 progression of this litigation and will allow the parties to reasonably meet-and-confer on a  
11 number of procedural and substantive issues which, if left unresolved, might necessitate the  
12 filing of one or more Rule 12 motions;

13 WHEREAS, on August 4, 2010 and thereafter, counsel for the parties met-and-conferred  
14 with one another and agree that the current deadline to complete non-expert witness discovery  
15 (September 3, 2010) should be extended for a period of not less than ninety (90) days, through  
16 and including December 3, 2010;

17 WHEREAS, on August 4, 2010 and thereafter, counsel for the parties met-and-conferred  
18 with one another and agree that the Case Management Conference presently scheduled for  
19 August 27, 2010 at 9:00 a.m., should be continued to a mutually convenient date and time for all  
20 parties and the Court during the week of September 13, 2010; and

21 WHEREAS, on August 4, 2010 and thereafter, counsel for the parties met-and-conferred  
22 with one another and agree that the hearing on Patterson's Motion to Dismiss Plaintiff's  
23 Eleventh Claim for Intentional Interference with an Existing Contractual Relationship, presently  
24 scheduled for August 27, 2010 at 9:00 a.m., should be continued to a mutually convenient date  
25 and time for all parties and the Court to coincide with the rescheduled Case Management  
26 Conference, during the week of September 13, 2010.

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STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED  
COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING  
CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO  
DISMISS ELEVENTH CLAIM

NOW, THEREFORE, the parties stipulate and agree as follows:

1. The deadline for JTFC to answer or otherwise respond to the Amended Complaint shall be extended until August 31, 2010;
2. The deadline for Amber to answer or otherwise respond to the Amended Complaint shall be extended until August 31, 2010;
3. The deadline for completing non-expert witness discovery (September 3, 2010) should be continued until December 3, 2010;
4. The Case Management Conference currently scheduled to occur on August 27, 2010 should be continued until a mutually convenient date and time for the Court and all parties during the week of September 13, 2010; and
5. The hearing on Patterson's Motion to Dismiss Plaintiff's Eleventh Claim for Intentional Interference with an Existing Contractual Relationship currently scheduled to occur on August 27, 2010 should be continued until a mutually convenient date and time for the Court and all parties, to coincide with the rescheduled Case Management Conference, during the week of September 13, 2010.

**IT IS SO STIPULATED.**

DATED: July 30, 2010

**HANTMAN & ASSOCIATES**

By: Robert J. Hantman  
Robert J. Hantman, Esq.  
Attorneys for Plaintiff, Blinglet, Inc.

DATED: July 30, 2010

**INGBER & ASSOCIATES**  
A PROFESSIONAL LAW  
CORPORATION

STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO DISMISS ELEVENTH CLAIM

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By: /s/ Kenneth S. Ingber  
Kenneth S. Ingber, Esq.  
Attorneys for Plaintiff, Blinglet, Inc.

DATED: August 18, 2010

**EDGERTON & WEAVER, LLP**

By: /s/ Theodore C. Peters  
Theodore C. Peters, Esq.  
Attorneys for Defendant,  
John Thomas Financial Corporation

DATED: August 18, 2010

**GORDON & REES, LLP**

By: /s/ Andrew Castricone  
Andrew Castricone, Esq.  
Attorneys for Defendant,  
Amber Alert Safety Center, Inc.

DATED: August 18, 2010

**MORISON HOLDEN DEREWETZKY &  
PROUGH, LLP**

By: /s/ William Campbell Morison  
William Campbell Morison, Esq.  
Attorneys for Defendant,  
Kai Patterson

STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED  
COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING  
CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO  
DISMISS ELEVENTH CLAIM

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles. I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 2615 Pacific Coast Highway, Suite 300, Hermosa Beach, California 90254.

On August 18, 2010, I served the following document described as:

**STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO DISMISS ELEVENTH CLAIM**

on the interested parties in this action by placing the true copies thereof enclosed in sealed envelopes as follows:

**PLEASE SEE ATTACHED SERVICE LIST**

- ( ) **By U.S. Mail:** I deposited such envelopes in the mail at Hermosa Beach, California. The envelopes were mailed with postage thereon fully prepaid.
- ( ) **By Personal Service:** I caused such envelope to be delivered by hand to the individuals at the addresses listed.
- ( ) **By Overnight Courier:** I caused the above-referenced document(s) to be delivered to an overnight courier service (FedEx), for delivery to the above addressee(s).
- ( ) **By Facsimile Machine:** I caused the above-referenced document(s) to be transmitted to the above-named person at the following telephone number above.
- (X) **By Electronic E-mail:** I caused the above-referenced document(s) to be transmitted to the above-named person at the following addresses.
- (X) **(FEDERAL)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

EXECUTED on August 18, 2010, at Hermosa Beach, California.

Carole Serrano  
Carole Serrano

STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO DISMISS ELEVENTH CLAIM

Blinglet, Inc. v. Amber Alert Safety Centers, Inc., et al.  
USDC Case No. C 09-05156 SI

**SERVICE LIST**

<b><u>PLAINTIFF'S COUNSEL:</u></b> Kenneth S. Ingber, Esq. Ronald Anthony DiPietra, Jr., Esq. <b>INGBER &amp; ASSOCIATES</b> 2029 Century Park East, Suite 1400 Los Angeles, CA 90067	Tel: (424) 202-3620 Fax: (424) 247-0343 E-mail: <a href="mailto:ken@ingberlawyers.com">ken@ingberlawyers.com</a> Email: <a href="mailto:anthony@ingberlawyers.com">anthony@ingberlawyers.com</a>
<b><u>CO-COUNSEL FOR PLAINTIFF:</u></b> Robert J. Hantman, Esq. <b>HANTMAN &amp; ASSOCIATES</b> Pro Hac Vice 1515 Broadway, 11 <sup>th</sup> Floor New York, NY 10036	Tel: (212) 684-3933 Fax: (212) 520-4301 E-mail: <a href="mailto:rhantman@hantmanlaw.com">rhantman@hantmanlaw.com</a>
<b><u>DEFENDANT</u></b> <b><u>AMBER ALERT SAFETY CENTER, INC.:</u></b> Andrew Castricone, Esq. <b>GORDON &amp; REES LLP</b> 275 Battery Street, Suite 2000 San Francisco, CA 94111	Tel: (415) 986-5900 Fax: (415) 986-8034 E-mail: <a href="mailto:acastricone@gordonrees.com">acastricone@gordonrees.com</a>
<b><u>DEFENDANT:</u></b> <b><u>KAI D. PATTERSON:</u></b> Joel Max Eads <b>MORISON HOLDEN DEREWETZKY &amp; PROUGH, LLP</b> The Times Building, Suite 402 32 Parking Plaza Ardmore, PA 19003  Thomas Holden, Esq. William Campbell Morison, Esq. <b>MORISON HOLDEN DEREWETZKY &amp; PROUGH, LLP</b> 1550 Parkside Drive, Third Floor Walnut Creek, CA 94596	Direct: 267.528.0728 Tel: 484.418.1510 Fax: 484.418.1509 E-mail: <a href="mailto:Joel.Eads@mhdplaw.com">Joel.Eads@mhdplaw.com</a>  <i>ATTORNEY TO BE NOTICED</i>  Tel: 925-937-9990 Fax: 925-937-3272 Email: <a href="mailto:thomas.holden@mhdplaw.com">thomas.holden@mhdplaw.com</a> Email: <a href="mailto:william.morison@mhdplaw.com">william.morison@mhdplaw.com</a>

STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF, AND CONTINUING CASE MANAGEMENT CONFERENCE AND HEARING ON PATTERSON'S MOTION TO DISMISS ELEVENTH CLAIM

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**FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION**

BLINGLET, INC., a Delaware corporation,

Plaintiff,

vs.

AMBER ALERT SAFETY CENTERS, INC., a  
Nevada corporation; KAI D. PATTERSON;  
GALAXY MEDIA AND MARKETING  
CORPORATION, a successor to Amber Alert  
Safety Centers, Inc.; JOHN THOMAS  
FINANCIAL CORPORATION; JOHN  
THOMAS BRIDGE AND OPPORTUNITY  
FUND; and JOHN DOES 1-100,

Defendants.

Case No. C 09-05156 SI

**ORDER EXTENDING TIME FOR  
DEFENDANTS JOHN THOMAS  
FINANCIAL CORPORATION AND  
AMBERT ALERT SAFETY  
CENTERS, INC. TO RESPOND TO  
AMENDED COMPLAINT,  
EXTENDING NON-EXPERT  
DISCOVERY CUTOFF AND  
CONTINUING HEARING DATES**

THIS MATTER, having come before the Court on the Parties' Stipulation, dated August 18, 2010, the Court being fully advised in the premises, and finding good cause therefore, hereby rules as follows:

1. The deadline for Defendants John Thomas Financial Corporation and Amber Alert Safety Centers, Inc. to respond to the Amended Complaint shall be extended until August 31, 2010;

**ORDER EXTENDING TIME FOR DEFENDANTS JOHN THOMAS FINANCIAL AND  
AMBER TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT  
DISCOVERY CUTOFF AND CONTINUING HEARING DATES**

2. The current deadline for completing non-expert witness discovery (September 3, 2010) is continued until December 3, 2010;
3. The Case Management Conference currently scheduled to occur on August 27, 2010 is continued until Oct. 25, 2010, 2010 at 2:30 a.m./p.m.;  
and
4. The hearing on Defendant Patterson's Motion to Dismiss Plaintiff's Eleventh Claim for Intentional Interference with an Existing Contractual Relationship currently scheduled to occur on August 27, 2010 is continued until  
September 17, 2010, 2010 at 9:00 a.m./p.m.

IT IS SO ORDERED.

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

  
SUSAN ILLSTON  
United States District Judge

ORDER EXTENDING TIME FOR DEFENDANTS JOHN THOMAS FINANCIAL AND  
AMBER TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT  
DISCOVERY CUTOFF AND CONTINUING HEARING DATES



**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles. I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 2615 Pacific Coast Highway, Suite 300, Hermosa Beach, California 90254.

On August 18, 2010, I served the following document described as:

**ORDER EXTENDING TIME FOR DEFENDANTS JOHN THOMAS FINANCIAL CORPORATION AND AMBERT ALERT SAFETY CENTERS, INC. TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT DISCOVERY CUTOFF AND CONTINUING HEARING DATES**

on the interested parties in this action by placing the true copies thereof enclosed in sealed envelopes as follows:

**PLEASE SEE ATTACHED SERVICE LIST**

- ☐ **By U.S. Mail:** I deposited such envelopes in the mail at Hermosa Beach, California. The envelopes were mailed with postage thereon fully prepaid.
- ☐ **By Personal Service:** I caused such envelope to be delivered by hand to the individuals at the addresses listed.
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- ☒ **By Electronic E-mail:** I caused the above-referenced document(s) to be transmitted to the above-named person at the following addresses.
- ☒ **(FEDERAL)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

EXECUTED on August 18, 2010, at Hermosa Beach, California.

/s/ Carole Serrano  
Carole Serrano

ORDER EXTENDING TIME FOR DEFENDANTS JOHN THOMAS FINANCIAL AND  
AMBER TO RESPOND TO AMENDED COMPLAINT, EXTENDING NON-EXPERT  
DISCOVERY CUTOFF AND CONTINUING HEARING DATES

Blinglet, Inc. v. Amber Alert Safety Centers, Inc., et al.  
USDC Case No. C 09-05156 SI

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ORDER EXTENDING TIME FOR DEFENDANTS JOHN THOMAS FINANCIAL AND  
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