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1 KILPATRICK TOWNSEND & STOCKTON LLP
 2 JAMES G. GILLILAND, JR. (State Bar No. 107988)
 3 TIMOTHY R. CAHN (State Bar No. 162136)
 4 HOLLY GAUDREAU (State Bar No. 209114)
 5 RYAN BRICKER (State Bar No. 269100)
 6 Two Embarcadero Center Eighth Floor
 7 San Francisco, CA 94111
 Telephone: (415) 576-0200
 Facsimile: (415) 576-0300
 Email: jgilliland@kilpatricktownsend.com
 tcahn@kilpatricktownsend.com
 hgaudreau@kilpatricktownsend.com
 rbricker@kilpatricktownsend.com

8 Attorneys for Plaintiff
 9 SONY COMPUTER ENTERTAINMENT AMERICA LLC

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 SONY COMPUTER ENTERTAINMENT
 14 AMERICA LLC, a Delaware limited liability
 company,

15 Plaintiff,

16 v.

17 ZOOMBA LDC;
 18 WWW.SHOPPSJAILBREAK.COM; VLAD
 19 GAZOUNE, individually and doing business
 20 as ZOOMBA LDC and
 21 WWW.SHOPPSJAILBREAK.COM; THAHN
 22 NGUYGEN, individually and doing business
 23 as USATECHCITY, LTD; ARTHUR BATES
 24 II, individually and doing business as PSP
 25 PIT STOP; TOM NOOKER, individually and
 26 doing business as
 27 WWW.BUYPS3JAILBREAK.WEBS.COM;
 28 ALEX ESQUIVEL, individually and doing
 business as NDSGAMER; BIN LE ZHONG
 aka BEN LEE, individually and doing
 business as
WWW.PS3BREAKONLINE.COM; and FAI
 KING FONG, individually and doing business
 as WWW.PS3BREAKONLINE.COM; and
 HUANRAN LEE, individually and doing
 business as WWW.GETPS3BREAK.COM;
 and DOES 9 through 100,

Defendants.

Case No. C10-03909 RS

**REQUEST AND ~~PROPOSED~~ ORDER
 TO CONTINUE FEBRUARY 24, 2011
 CASE MANAGEMENT CONFERENCE**

Judge: Hon. Richard Seeborg

REQUEST AND ~~PROPOSED~~ ORDER TO CONTINUE FEBRUARY 24, 2011 CASE MANAGEMENT
 CONFERENCE

CASE NO. C10-03909 RS



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Plaintiff Sony Computer Entertainment America LLC (“SCEA”) hereby requests that the Initial Case Management Conference which is currently scheduled for February 24, 2011 be continued for approximately 60 days until April 21, 2011.

This case involves two foreign and six United States defendants. All of the United States defendants have been served, but none have filed answers to the complaint or made appearances in this action. The foreign defendants have not yet been served. Only three of the United States defendants (Thahn Nguyen of USATech City, Ltd. and Bin Le Zhong and Fai King Fong of Ps3breakonline.com) are represented by counsel. Since the Court entered the Preliminary Injunction Order on October 10, 2010 [Docket No. 49], counsel for SCEA has been engaged in discussions with the United States defendants regarding compliance with the Order and the possibility of resolving SCEA’s claims against some of the defendants, as well as possible entry of consent judgments and permanent injunctions.

In light of the circumstances, SCEA believes it would be appropriate to continue the Initial Case Management Conference for a sufficient amount of time to allow these discussions to proceed. Counsel for SCEA has notified all of the defendants of SCEA’s intent to seek a continuance of the Initial Case Management Conference. Counsel for defendants Thahn Nguyen, Bin Le Zhong and Fai King Fong responded that they do not object to a continuance. None of the other defendants responded to counsel for SCEA. Accordingly, SCEA respectfully requests that the Initial Case Management Conference currently set for February 24, 2011 be continued approximately 60 days to April 21, 2011.

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1 DATED: February 17, 2011

Respectfully submitted,

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KILPATRICK TOWNSEND & STOCKTON LLP

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By: /s/ Holly Gaudreau

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JAMES G. GILLILAND, JR

6

TIMOTHY R. CAHN

HOLLY GAUDREAU

RYAN BRICKER

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Attorneys for Plaintiff

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SONY COMPUTER ENTERTAINMENT AMERICA

LLC

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[PROPOSED] ORDER

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It is hereby ordered that the Request to Continue the Initial Case Management

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Conference is GRANTED. The Initial Case Management Conference is hereby

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scheduled for April 21, 2011.

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IT IS SO ORDERED.

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DATED: 2/18/11

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HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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