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10 Attorneys for Plaintiffs
 11 SCHAECHTER ACQUISITIONS, INC.
 12 AND PHILIP SCHAECHTER

13 IN THE UNITED STATES DISTRICT COURT
 14 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 SCHAECHTER ACQUISITIONS, INC., a
 17 Nevada corporation, and PHILIP
 18 SCHAECHTER, an individual,

19 Plaintiffs,

20 v.

21 GEORGE HEIN, Individually and
 22 Doing Business As "PROTEACHER",
 23 and PROTEACHER,

24 Defendants.

25 **Case No. 10-cv-4372 CRB**

26 **STIPULATION AND ~~PROPOSED~~ ORDER**
 27 **REGARDING CASE MANAGEMENT**
 28 **CONFERENCE**

29 This Mutual Stipulation is hereby entered into between Plaintiffs Schaechter Acquisitions,
 30 Inc. and Philip Schaechter and Defendants George Hein and ProTeacher (collectively, the
 31 "Parties") by their respective counsel pursuant to Local Rule 7-12 Counsel for Defendants hereby
 32 appears special, and without waiver of any rights to object to the Complaint, for purposes of this
 33 Stipulation only.

34 **RECITALS**

35 A. On October 15, 2010, the Parties entered into a written Tolling Agreement in order
 36 to facilitate ongoing settlement negotiations between them in order to resolve this matter.
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1 B. The tolled period of the Tolling Agreement expires on January 13, 2011.

2 C. The Tolling Agreement states that Defendants George Hein and ProTeacher will
3 accept service of process of the Complaint through counsel at the end of the tolled period;

4 D. Accordingly, the Parties hereby agree as follows:

5 **STIPULATION**

6 1. The Parties respectfully request the court continue the Case Management
7 Conference currently set for January 14, 2011 until March 18, 2011 in order to allow them time
8 finalize, if possible, their settlement discussions, to serve the Complaint, to respond to the
9 Complaint, and to meet and confer on all topics related to the Case Management Conference.

10
11 IT IS SO STIPULATED.

12 Dated: January 4, 2011

COMPUTERLAW GROUP LLP

13
14 By: /s/ Jack Russo
Jack Russo
Christopher Sargent

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16 Attorney for Plaintiffs
SCHAECHTER ACQUISITIONS, INC. AND
17 PHILIP SCHAECHTER

18 Dated: January 4, 2011

TURNER BOYD LLP

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20 By: /s/ Julie Turner
Julie Turner

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22 Appearing Specially on Behalf of
GEORGE HEIN

23
24 I attest under penalty of perjury that concurrence in the filing of this document has been
25 obtained from Julie Turner.

26 /s/ Jack Russo
Jack Russo

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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Dated: January 06, 2011

