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12 Attorneys for Plaintiff United States Small Business
 13 Administration in its capacity as Receiver for Rocket
 Ventures II SBIC, L.P.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 United States Small Business Administration in
 18 its capacity as Receiver for Rocket Ventures II
 SBIC, L.P.,

Case No.: CV-10-4425

19 Plaintiff,

**STIPULATION TO CONTINUE
 PRETRIAL CONFERENCE AND
 TRIAL DATES**

20 vs.

21 Rocket Ventures II, L.P., a California limited
 22 partnership; Rocket Ventures II CEO Fund, L.P.,
 23 a California limited partnership; Rocket
 Ventures SBIC Partners, LLC, a Delaware
 24 limited liability company; Cordusio Societa
 Fiduciaria Per Azioni Lozia Federico; Kenneth
 25 W.& Melissa Baldwin; Paul Cantwell; Peter
 Ayrton Cheese; Yves Derville; Richard S.
 26 Cuccioli; Alistair Anderson Donald; Philippe
 Gire; Jean-Claude Guez; Joseph Hawes &
 27 Christopher Eyden; Alan John Healey; Craig
 Foster Heimark; David E. Kropp; Gregory

28 **CAPTION CONTINUED ON NEXT PAGE**

1 Charles Meekings; Michele Liberato;
2 Fred Cucchi; ValorLife; Alberto Gandini; Rijete
3 Pty. Ltd.; Christopher Stainton; Tyna
4 Development; Thomas Tynan; Patrice Vinet;
5 Hahei Limited; Michel Saunier; Michel
6 Roujansky; Nigel Backwith; Justine Lumb;
7 Andrew Middleton; Ajmair Singh Bhullar;
8 Estate of Grant A. Dove; Luca Casiraghi; David
9 Mather,
10
11 Defendants.

12 Plaintiff United States Small Business Administration in its capacity as Receiver for
13 Rocket Ventures II, L.P. (“Plaintiff”) and the entity defendants, Rocket Ventures II L.P., Rocket
14 Ventures II CEO Fund, L.P., and Rocket Ventures SBIC Partners, LLC (collectively, the “Entity
15 Defendants”) and together with the Plaintiff, the “Parties”), by and through their respective
16 counsel of record, hereby stipulate and agree as follows:

17 1. On September 10, 2013, this Court entered an “Order (1) Adopting Report and
18 Recommendation on Plaintiff’s Motions for Default Judgment, (2) Requiring Status Report, and
19 (3) Continuing Dates [Doc. No. 161], ordering, among other things, that the pretrial conference
20 and trial in this action are continued to November 12, 2013 and December 9, 2013, respectively.

21 2. As the Parties have been in active communication to resolve the matter without
22 further litigation, the Parties agree that a pretrial conference and trial before the end of this year
23 would not be judicious. Recently, the Plaintiff requested to review certain documents from the
24 Entity Defendants, who have been working cooperatively with the Plaintiff. The Entity
25 Defendants are currently gathering such documents and will be producing them to the Plaintiff
26 shortly.

27 3. Additionally, due to unexpected circumstances regarding the medical condition of
28 lead counsel for the Entity Defendants, the parties believe it would be most prudent to defer the
pretrial conference and trial dates for at least six (6) months from the current dates set to allow
time to transition to new counsel for the Entity Defendants, should this case not be resolved

1 before that time. The declaration from Ann M. Mooney, colleague to lead counsel for the Entity
2 Defendants, is concurrently filed herewith.

3 THEREFORE, UPON APPROVAL BY THE COURT, it is hereby stipulated by and
4 between the Parties as follows:

5 (1) that the pretrial conference set for November 12, 2013 shall be continued to May ¹²13,
6 2014, at 1:30 p.m.; and

7 (2) that the bench trial set for December 9, 2013 shall be continued to June 9, 2014, at
8 8:00 a.m.

9
10 Dated: September 16, 2013

SCHNADER HARRISON SEGAL & LEWIS LLP

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12
13 By: /s/ Melissa S. Lor
14 T. Scott Tate
15 Melissa S. Lor
16 Attorneys for Plaintiff
17 United States Small Business
18 Administration in Its Capacity as Receiver
19 for Rocket Ventures II SBIC, L.P.

20 Dated: September 16, 2013

Cooley LLP

21 By: /s/ Abby Pringle
22 Gordon C. Atkinson
23 Abby Pringle
24 Counsel for Rocket Ventures SBIC
25 Partners, LLC; Rocket Ventures II CEO
26 Fund, L.P.; and Rocket Ventures II, L.P.

27 PURSUANT TO STIPULATION, ~~IT IS SO ORDERED:~~ AS MODIFIED ABOVE, IT IS SO
28 ORDERED.

Dated: September 24, 2013


Honorable Judge Jeffrey S. White
United States District Court Judge