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 12 Administration in its capacity as Receiver for Rocket
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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

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

19 Plaintiff,

20 vs.

21 Rocket Ventures II, L.P., a California limited
 22 partnership; Rocket Ventures II CEO Fund, L.P.,
 a California limited partnership; Rocket
 23 Ventures SBIC Partners, LLC, a Delaware
 limited liability company; Cordusio Societa
 24 Fiduciaria Per Azioni Lozia Federico; Kenneth
 W.& Melissa Baldwin; Paul Cantwell; Peter
 25 Ayrton Cheese; Yves Derville; Richard S.
 Cuccioli; Alistair Anderson Donald; Philippe
 26 Gire; Jean-Claude Guez;

27 **CAPTION CONTINUED ON NEXT PAGE**

Case No.: CV-10-4425

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
 TRIAL, DISCOVERY, AND RELATED
 DATES IN LIGHT OF ADDITION OF
 NEW DEFENDANTS.**

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Joseph Hawes & Chrisopher Eyden; Alan John Healey; Craig Foster Heimark; David E. Kropp; Gregory Charles Meekings; Michele Liberato; Fred Cucchi; ValorLife; Alberto Gandini; Rijete Pty. Ltd.; Christopher Stainton; Tyna Development; Thomas Tynan; Patrice Vinet; Hahei Limited; Michel Saunier; Michel Roujansky; Nigel Backwith; Justine Lumb; Andrew Middleton; Ajmair Singh Bhullar; Estate of Grant A. Dove; Luca Casiraghi; David Mather,

Defendants.

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As the Plaintiff Receiver for Rocket Ventures II SBIC L.P. (“the Receiver”) has now finished its investigation of amounts due and owing by the Class B Limited Partners of the Parent Fund Defendants Rocket Ventures II L.P. and Rocket Ventures CEO Fund, L.P., and

As the Receiver has now demanded payment from the Class B Limited Partners of the Defendants; and

As the Class B Limited Partners have not remitted payment of the outstanding Demands; and

As the Receiver was authorized “to prosecute claims against any Class B Limited Partners by amendment to Complaint against the Defendants without further order of this Court” pursuant to the September 2, 2010, Order in the Receivership Action modifying the stay of proceedings (“Lift Stay Order ¶ 2(e)”); and

As the Receiver has now filed and served its Amended Complaint naming Thirty Three (33) Class B Limited Partners as Defendants in this matter; and

As the Amended Complaint was authorized by the Lift Stay Order, but is contrary to the current scheduling Order entered August 1, 2011; rather than file a separate proceeding (possibly related and later consolidated) or independent action requiring additional attention to ensure consistent process; and

1 As the Defendants identified below have agreed to the amendments to the complaint and
2 extension of the related deadlines so that it is not faced with a multiplicity of actions, increased
3 attorneys' fees and costs, as well as other potential inefficiencies; and

4 For these reasons, as well as the reasons set forth more fully in the Stipulation To
5 Continue Trial, Discovery, and Related Dates and Declarations of Richard Moser and T. Scott
6 Tate, Plaintiff and Defendants identified below stipulate to the Continuance of the Trial,
7 Discovery and Related Dates.

8 IT IS HEREBY STIPULATED AND AGREED THAT:

- 9 1. The Trial, currently set for November 5, 2012, shall be continued to June ¹⁰~~3~~, 2013;
- 10 at 8:00 a.m.;
- 11 2. Close of Percipient Witness Discovery to be Continued to August 10, 2012;
- 12 3. Dispositive Motions to be ^{heard}~~Filed~~ on or before February ²²~~18~~, 2013;
- 13 4. Pretrial Conference to be held on May 20, 2013; and
- 14 5. ~~Joint Supplemental Case management Statement due on June 11, 2013.~~

15 So Stipulated.

16 Dated: January 24, 2012

SCHNADER HARRISON SEGAL & LEWIS LLP

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19 By: /s/ T. Scott Tate
T. Scott Tate
Attorneys for Plaintiff
United States Small Business
Administration in Its Capacity as Receiver
for Rocket Ventures II SBIC, L.P.

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21 Dated: January 24, 2012

22 U.S. SMALL BUSINESS ADMINISTRATION

23
24 By: /s/ Arlene M. Embrey
Arlene M. Embrey
Office of General Counsel
Attorneys for Plaintiff,
United States Small Business
Administration in its capacity as Receiver
for Rocket Ventures II SBIC, L.P.

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1 Dated: January 24, 2012

Cooley LLP

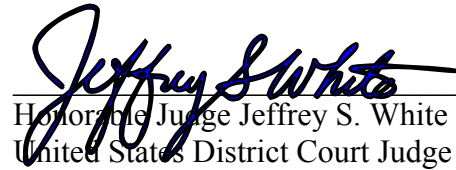
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By: /s/ Gordon C. Atkinson

Gordon C. Atkinson
Counsel for Rocket Ventures SBIC Partners,
LLC; Rocket Ventures II CEO Fund, L.P.;
and Rocket Ventures II, L.P.

PURSUANT TO STIPULATION, ~~IT IS SO ORDERED~~; AS MODIFIED ABOVE, IT IS SO ORDERED.

Dated: January ³¹__, 2012


Honorable Judge Jeffrey S. White
United States District Court Judge

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