

1 MICHAEL S. DEVORKIN (*pro hac vice*)  
 2 JACQUELINE G. VEIT (*pro hac vice*)  
 3 GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP  
 4 437 Madison Avenue  
 5 New York, New York 10022  
 6 Telephone: (212) 907-7300  
 7 Facsimile: (212) 754-0330  
 8 Email: [mdevorkin@golenbock.com](mailto:mdevorkin@golenbock.com)  
 9 Email: [jveit@golenbock.com](mailto:jveit@golenbock.com)

10 Attorneys for the Plaintiff,  
 11 Gerard A. McHale, Jr., P.A., Liquidation Trustee

12 JEROME N. LERCH (CSB #48194)  
 13 DEBRA STEEL STURMER (CSB #105276)  
 14 LERCH STURMER LLP  
 15 333 Bush Street, Ste. 2020  
 16 San Francisco, California 94104  
 17 Telephone: (415) 217-6340  
 18 Facsimile: (415) 217-2782  
 19 Email: [jlerch@lerchsturmer.com](mailto:jlerch@lerchsturmer.com)  
 20 Email: [dsturmer@lerchsturmer.com](mailto:dsturmer@lerchsturmer.com)

21 Attorneys for Defendant Silicon Valley Law Group

22 UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA -  
 23 SAN FRANCISCO DIVISION

24 GERARD A. MCHALE, Jr., P.A., as  
 25 Liquidation Trustee for the 1031 Debtors  
 26 Liquidation Trust,

27 Plaintiff,

28 v.

SILICON VALLEY LAW GROUP, a  
 California Law Corporation,  
 Defendant.

**CASE NO. CV10-4864 (JCS)**

**STIPULATION AND PROPOSED ORDER  
 TO FURTHER MODIFY THE CASE  
 MANAGEMENT AND PRETRIAL  
 ORDER, DATED SEPTEMBER 5, 2012**

WHEREAS, the final Pretrial Conference is scheduled for March 15, 2013; and

1                   WHEREAS, the Court’s Order entered September 5, 2012 (“Order”), required the  
2 parties to file objections to: (i) exhibits not less than ten days before the Pretrial Conference (March  
3 5, 2013) (Order § III(B)), and (ii) designations at least ten calendar days before the Pretrial  
4 Conference (March 5, 2013) (Order § III(T)(3)); and  
5

6                   WHEREAS, pursuant to a stipulation to modify the Order, entered into between the  
7 parties on September 25, 2012 and so ordered by the Court on September 26, 2012, the parties  
8 agreed to shorten the deadlines to file objections to exhibits and designations to December 19,  
9 2012; and  
10

11                   WHEREAS, Parties’ Oppositions to Other Side’s Motions *In Limine* and  
12 Defendant’s motion for partial summary judgment are due on December 19, 2012, (*See* September  
13 25, 2012 and November 16, 2012 orders); and  
14

15                   WHEREAS, a hearing on *in limine* motions, disputed items of testimony and  
16 exhibits, is scheduled for January 25, 2013; and  
17

18                   WHEREAS, given the upcoming holidays and the deadlines for the opposition  
19 papers to the pending motions, the parties agree that they will not have sufficient time to complete  
20 and file their respective objections to exhibits and designations by the revised earlier December 19,  
21 2012, deadline, and agree to extend that deadline but still leave sufficient time before the January  
22 25, 2013, hearing.  
23

24                   The undersigned parties hereby agree to further modify the Order and extend the  
25 deadline to file objections to exhibits and designations from December 19, 2012, to January 15,  
26 2013, which is ten days before the January 25, 2013 hearing.  
27  
28

1 DATED: November 21, 2012

GOLENBOCK EISEMAN ASSOR  
BELL & PESKOE LLP

By: /s/ Michael Devorkin

Michael S. Devorkin, Esq. (*pro hac vice*)  
Jacqueline G. Veit, Esq. (*pro hac vice*)  
Attorneys for Plaintiff Gerard A. McHale, Jr.,  
P.A., as Liquidation Trustee for the 1031  
Debtors Liquidation Trust

8 DATED: November 21, 2012

LERCH STURMER LLP

By: /s/ Debra Steel Sturmer

Jerome N. Lerch, Esq.  
Debra Steel Sturmer, Esq.  
Attorneys for Defendant Silicon Valley Law  
Group

15 **IT IS SO ORDERED.**

17 Dated: 11/30/12

