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15 Attorneys for Defendants  
 16 IGUACU, INC. and SHOBHA SETURAM

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA

19 CONQUISTA CONSULTORIA E  
 ASSESSORIA EMPRESARIAL, LTDA., a  
 20 Brazilian company,  
 21 Plaintiff,  
 22 v.  
 23 IGUACU, INC., a California corporation;  
 GOLDENGATE SOLUTIONS, INC., a  
 24 suspended California corporation; and SHOBHA  
 SETURAM, an individual California citizen,  
 25 Defendants.  
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No. CV-11-0602 RS

**JOINT CASE MANAGEMENT  
 STATEMENT; [~~PROPOSED~~] ORDER**

**Date:** April 11, 2013  
**Time:** 10:00am  
**Court:** Courtroom 3, 17th  
 floor

1 The following is intended to address the information required by Civil Local Rule 16-9 and  
2 the Standing Order to be included in Joint Case Management statements:

3 Plaintiff Conquista Consultoria e Assessoria Empresarial, Ltda. (“Conquista”) brought this  
4 action against defendants Iguacu, Inc. (“Iguacu”), GoldenGate Solutions, Inc. (“GoldenGate”), and  
5 Ms. Shobha Seturam to recover a percentage of the finder’s fees recovered by Iguacu in a separate  
6 action pending in this court, *Iguacu v. Cabrera*, case no. CV-09-00380-RS. Jurisdiction is based on  
7 28 U.S.C. § 1332. The complaint prayed for damages in an amount of not less than \$4 million.  
8 Conquista also filed a certificate of interested persons or entities. (Docket #2.)

9 Iguacu and Ms. Seturam filed an answer denying liability and asserting various affirmative  
10 defenses. (Docket #19.) GoldenGate has been served with the summons and complaint (Docket  
11 #10), but it is a suspended corporation and has not yet appeared in this action.

12 The Court related *Iguacu v. Cabrera* to this case by order dated February 24, 2011. (Docket  
13 #14.)

14 This action has been stayed, pending resolution of *Iguacu v. Cabrera* or further order of this  
15 Court, by stipulation and order entered on March 22, 2011. (Docket #22.)

16 *Iguacu v. Cabrera* is still pending. Trial has been set for September 23, 2013.

17 Since this case was stayed, the parties in this case have taken no other actions relating to this  
18 litigation, except the filing of stipulations asking the Court to continue scheduled standby case  
19 management conferences. The parties agree that this case should continue to be stayed in  
20 accordance with the order of March 22, 2011. The parties further agree that the CMC currently  
21 scheduled for April 11, 2013 be continued for at least six months.

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1 DATED: April 4, 2013

2 BRISCOE IVESTER & BAZEL LLP

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5 By: /s/ Peter Prows  
6 PETER PROWS  
7 Attorneys for Plaintiffs  
8 CONQUISTA CONSULTORIA E  
ASSESSORIA EMPRESARIAL, LTDA.

9 SIDEMAN & BANCROFT LLP

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11 By: /s/ Constance Yu (per authorization)  
12 Constance Yu  
13 Attorneys for Defendants  
14 IGUACU, INC. and SHOBHA SETURAM

1 **[PROPOSED] ORDER**

2 Good cause appearing, the CMC currently scheduled for April 11, 2013 is continued to  
3 October 17, 2013 at 10:00 a.m.

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5 DATED: 4/9/13



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7 HONORABLE RICHARD SLEBORG  
8 Judge of the U.S. District Court

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