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Attorneys for Defendants
 METRO NATIONAL FINANCIAL, LLC
 KARMA TECHNOLOGIES, LLC
 RODNEY NEWMAN
 JOHN DAVID BIGGERS
 NCV SOFTWARE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

24	BRADFORD TECHNOLOGIES, INC.,)	Case No. 3:11-CV-04621 (EDL)
)	
25	Plaintiff,)	STIPULATION AND ORDER TO STAY
	v.)	LITIGATION FOR ADDITIONAL 90
26)	DAYS AS MODIFIED
)	
27	NCV SOFTWARE.com, et al.,)	
)	
28	Defendants.)	

1 WHEREAS, Plaintiff Bradford Technologies, Inc. (“Plaintiff”) and Defendants Metro
2 National Financial, LLC (“Metro Financial”), Karma Technologies, LLC (“Karma”), Rodney
3 Newman (“Newman”), John David Biggers (“Biggers”) and NCV Software (collectively,
4 “Defendants”) (representing all defendants who have been served in this matter), have agreed to
5 participate in private mediation of this matter before a neutral;
6

7 WHEREAS, the parties have tentatively scheduled a mediation with the Hon. Jamie
8 Jacobs-May with Judicial Arbitration and Mediation Services on June 15, 2012;

9 WHEREAS, the parties wish to avoid the burden and expense of the litigation pending
10 the outcome of their private mediation;

11 IT IS HEREBY STIPULATED and AGREED by and between the foregoing parties in
12 this matter, through their respective counsel of record, as follows:
13

14 1. This action should be stayed until July 15, 2012, to permit the parties to retain
15 experts to review and compare the source code, software platform and other information relative
16 or germane to the issues raised in this case and to participate in private mediation before a
17 neutral.

18 2. If the stay is entered, then the scheduled April 24, 2012 hearing before the court
19 shall be vacated. The motions to dismiss filed by Defendants Metro Financial, Newman and
20 Karma, as well as the case management conference before the Court, shall be continued to a date
21 to be set at a later time (but not during the pendency of the stay).

22 3. The parties have agreed upon an appropriate form of protective order, which shall
23 be submitted to the court.
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25 4. Any party may request an order from the Court to modify or lift this stay upon
26 good cause after consultation with counsel for the other parties to this action.
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IT IS SO STIPULATED.

Dated: April 16, 2012

THE HERITAGE LAW GROUP

/s/ ROGER D. WINTLE

Roger D. Wintle
Attorney for Plaintiff: Bradford Technologies, Inc

Dated: April 16, 2012

ANDERSON & KARREBERG, P.C.

By: /s/ Heather M. Sneddon

- and -

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NCV SOFTWARE

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The Initial Case Management Conference is continued to July 17, 2012 at 10:00 a.m. Updated Case Management Conference Statements are due by July 10, 2012.

Dated: April 19, 2012

