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 7 MONTEBUENO MARKETING INC.,  
 8 LIONG LIONG SY, and SABROSA  
 9 FOODS, INC.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 MONTEBUENO MARKETING INC., a  
 15 Philippine Corporation; LIONG LIONG SY,  
 16 a Philippine individual; SABROSA  
 17 FOODS, INC., a Philippine Corporation,

17 Plaintiffs,

18 vs.

19 DEL MONTE CORPORATION-USA, a  
 20 New York Corporation; PAUL E. DERBY,  
 21 JR., a California individual; DANIEL  
 22 COLLINS, a California individual; and  
 23 LUIS HIDALGO, a California individual,

22 Defendants.

Case No. CIV 11 4977 MEJ

**STIPULATION TO CONTINUE THE  
 INITIAL CASE MANAGEMENT  
 CONFERENCE AND OTHER  
 PRETRIAL DEADLINES; ~~PROPOSED~~  
 ORDER**

25 Plaintiffs MONTEBUENO MARKETING INC. (“MMI”), LIONG LIONG SY (“Sy”),  
 26 and SABROSA FOODS, INC. (“Sabrosa”) (collectively “Plaintiffs”) and Defendants DEL  
 27 MONTE CORPORATION U.S.A., (“DMC-USA”), PAUL E. DERBY, JR. (“Derby”), DANIEL  
 28

1 COLLINS (“Collins”), and LUIS HIDALGO (“HIDALGO”) (collectively “Defendants”), hereby  
2 stipulate as follows:

3 WHEREAS,

4 1. The Complaint in this case was filed on October 7, 2011.

5 2. Defendants were served by mail and notice and acknowledgment of receipt,  
6 pursuant to CCP § 415.30, as allowed by Fed. R. Civ. Proc. 4(e)(1). Service was effective on  
7 December 12, 2011.

8 3. The Order Setting Initial Case Management Conference and ADR Deadlines in  
9 this case scheduled the following: (a) January 5, 2012, as the last day to meet and confer re:  
10 initial disclosures, early settlement, ADR process selection, and discovery plan; file ADR  
11 Certification; and, file either an ADR Stipulation or Need for ADR Phone Conference; (b)  
12 January 19, 2012 as the last day to file a Rule 26(f) Report, complete initial disclosures, and, file  
13 a Case Management Statement; and (c) January 26, 2012, as the date of the initial case  
14 management conference.

15 4. Defendants have not appeared in the case. By Stipulation filed on December 19,  
16 2011, the parties agreed that Defendants shall have until January 18, 2012 to file a responsive  
17 pleading to the Complaint.

18 As such, IT IS HEREBY STIPULATED AND AGREED, by and between the parties  
19 hereto, through their respective counsel, that the Initial Case Management Conference originally  
20 scheduled for January 26, 2012, is continued to March 1, 2012, and, all other pretrial deadlines  
21 are continued accordingly.

22  
23 Date: January 5, 2012

IBARRA PROFESSIONAL LAW CORPORATION


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25 

26 By: Gener D. Benitez  
27 Attorney for Plaintiffs  
28 MONTEBUENO MARKETING, INC. LIONG LIONG  
SY, and SABROSA FOODS, INC.

1 Date: January 5, 2012

DUDNICK DETWILER RIVIN & STIKKER LLP


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By: William C. Wilka  
Attorney for Defendants  
DEL MONTE CORPORATION, PAUL E. DERBY, JR.,  
DANIEL COLLINS and LUIS HIDLAGO

**ORDER**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT the Initial Case Management scheduled for January 26, 2012 is continued to March 1, 2012, at 10:00 a.m. The last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan; file ADR Certification; and, file either an ADR Stipulation or Need for ADR Phone Conference is now set for February 9, 2012. The last day to file a Rule 26(f) Report, complete initial disclosures, and, file a Case Management Statement is now set for February 23, 2012.

Dated: 1/11/12

  
MARIELLEN JAMES  
United States District Court Magistrate