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

13 SECURITIES AND EXCHANGE
 14 COMMISSION,
 15 Plaintiff,
 16 v.
 17 THOMAS S. WU, EBRAHIM SHABUDIN,
 and THOMAS T. YU,
 18 Defendants.

Case No. 11-CV-4988 JSW
 STIPULATION TO CONTINUE
 CASE MANAGEMENT CONFERENCE
 AND ~~[PROPOSED]~~ ORDER
Case Management Conference
 Date: July 6, 2012
 Time: 1:30 p.m.
 Honorable Jeffrey S. White
 Courtroom 11, 19th Floor

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 22 This case is set for a Case Management Conference on July 6, 2012, and the parties
 23 submitted a Joint Case Management Statement on May 18, 2012. The proceedings and
 24 discovery in this case will be affected by issues also being addressed in two related proceedings,
 25 the criminal case against defendants Ebrahim Shabudin and Thomas Yu and the FDIC
 26 administrative case against all three defendants. According to a status report submitted in the
 27 criminal case, the Department of Justice is progressing toward making available to the
 28 defendants the large volume of documents obtained from United Commercial Bank by the FDIC.

1 The Court has scheduled a continued Status Conference in the criminal case for September 10,
2 2012. The parties to the civil case submit this Stipulation to Continue Case Management
3 Conference and Proposed Order, requesting the Court continue the Case Management
4 Conference to September 14, 2012, at 1:30 p.m, or a date convenient for the Court.

5 The parties believe that it is premature to set a schedule for discovery, pretrial, and trial at
6 this time. The defendants named in the related criminal case and the parties to the FDIC
7 administrative proceedings are seeking access to the large volume of documents obtained by the
8 FDIC. In a submission to this Court in the criminal case dated April 26, 2012, the United States
9 Attorney's Office and the Department of Justice outlined a proposal regarding a database of
10 documents that would be available to the defendants in this action and the related cases.
11 According to a submission dated June 1, 2012, the DOJ proposal is moving forward and is
12 scheduled to be available by the Fall of 2012. The parties believe that it would not be productive
13 to discuss a discovery and trial schedule until the criminal case discovery issues are resolved.

14 For the reasons discussed above, the parties jointly request and stipulate that the Case
15 Management Conference in this case be continued to September 14, 2012, or a date convenient
16 for the Court.

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18 Dated: June 29, 2012

Respectfully submitted,

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20 /s/ Lloyd Farnham
LLOYD FARNHAM
Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

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23 /s/ Steven Bauer
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/s/ James Lassart
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GENERAL ORDER 45 ATTESTATION


In accordance with General Order 45, each of the signatories to this document have concurred in its filing, and I shall maintain records to support these concurrences.

/s/ Lloyd Farnham
LLOYD FARNHAM
Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

~~[PROPOSED]~~ ORDER

The court HEREBY ORDERS, pursuant to the above stipulation, that the Case Management Conference currently set for July 6, 2012, is continued to September 14, 2012, at 1:30 pm.

DATED: July 2, 2012



Jeffrey S. White
United States District Judge