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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 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

JOINT STATUS REPORT AND
 STIPULATION TO CONTINUE
 CASE MANAGEMENT CONFERENCE

~~PROPOSED~~ ORDER

Case Management Conference

Date: April 26, 2013

Time: 1:30 p.m.

Honorable Jeffrey S. White

Courtroom 11, 19th Floor

21 This case is set for a Case Management Conference on April 26, 2013. As discussed in
 22 prior joint submissions to the Court, the proceedings and discovery in this case will be affected
 23 by issues also being addressed in two related proceedings, the criminal case against defendants
 24 Ebrahim Shabudin and Thomas Yu pending in this Court and the FDIC administrative case
 25 against all three defendants and others. The Department of Justice (DOJ) recently completed
 26 compilation of an omnibus database to be used in all three of the aforementioned actions.
 27
 28

1 That database, to which the criminal defendants obtained access within the last thirty days,
2 includes some seven million documents.

3 In light of the large volume of documentary discovery contained in the newly accessible
4 DOJ Database, on April 11, 2013 the Court continued the criminal case for status conference on
5 May 30, 2013 in order to allow the parties time to evaluate that database, and to meet and confer
6 regarding case scheduling and discovery related issues. Because of the overlapping discovery in
7 the three cases, the parties to the civil case submit this Stipulation to Continue the Case
8 Management Conference, requesting the Court continue the Conference to June 21, 2013, at 1:30
9 p.m., or a date convenient for the Court.

10 The parties believe that it is premature to set a schedule for discovery, pretrial, and trial at
11 this time. The defendants named in the related criminal case and the parties to the FDIC
12 administrative proceedings are in the process of evaluating a voluminous database of newly
13 available documents compiled by the DOJ. The parties believe it would not be productive to
14 discuss a discovery and trial schedule until the criminal case discovery issues are resolved.

15 For the reasons above, the parties jointly request and stipulate that the Case Management
16 Conference in this case be continued to June 21, 2013, or a date convenient for the Court.

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18 Dated: April 19, 2013

Respectfully submitted,

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

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22 /s/ Steven M. Bauer
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In accordance with Local Rule 5-1, 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 April 26, 2013, is continued to June 21, 2013, at 1:30 pm.

DATED: April 22, 2013


Jeffrey S. White
United States District Judge