## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

White Pacific Securities, Inc., Robert T. Angle and Arthur M. Quintero,	) Case No: 3:11-cv-06344-EDL
Plaintiffs,	Honorable Elizabeth Laporte
v.	) STIPULATION AND <del>[PROPOSED]</del>
	ORDER VACATING & RESETTING CMC
Daniel Gulak,	) DATE AND DATE BY WHICH JOINT
	) CMC STATEMENT WILL BE DUE
Defendant	)
•	)

Whereas the Case Management Conference ("CMC") in this case is currently set for April 5, 2012 at 10:00 AM and the Joint CMC Statement is due to be filed on March 26, 2012; and

Whereas Defendant Daniel Gulak's ("Defendant") Motion to Dismiss the Complaint is set to be heard on April 17, 2012 at 9:00 AM; and

Whereas, the Plaintiffs White Pacific Securities, Inc., Robert T. Angle, and Arthur M. Quintero (collectively, "Plaintiffs") and Defendant have met and conferred and believe that it will conserve judicial resources if the CMC is rescheduled until after the Court's decision on Defendant's Motion to Dismiss the Complaint.

Now therefore, Plaintiffs by and through their attorney Christopher Mader, Esq. of the Baldwin Law Group, and Defendant, by and through his attorney Val D. Hornstein, Esq. of The Hornstein Law Offices, Prof. Corp. hereby STIPULATE AND AGREE and request the Court to order that the current CMC date is VACATED and will be reset upon the Court's ruling on Defendant's Motion to Dismiss, and the Court will at the setting of the CMC date also set the date upon which the Joint CMC Statement will be due.

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## SO STIPULATED:

Date: March\_\_, 2012 By: <u>/s/ Christopher Mader</u>

Christopher Mader (SBN #199605)

Baldwin Law Group Attorney for Plaintiffs

Date: March\_\_, 2012 By: :\_/s/ Val Hornstein

Val D. Hornstein (SBN #133762) Hornstein Law Offices, Prof. Corp.

Attorney for Defendant

IT IS SO ORDERED.

Dated: March 23, 2012

