

1 CURTIS R. TINGLEY (SBN 112322)
2 *ctingley@tingleyllp.com*
3 KEVIN P. O'BRIEN (SBN 215148)
4 *kobrien@tingleyllp.com*
5 KEVIN W. ISAACSON (SBN 281067)
6 *kisaacson@tingleyllp.com*
7 TINGLEY PIONTKOWSKI LLP
8 10 Almaden Boulevard, Suite 430
9 San Jose, California 95113
Telephone: (408) 283-7000
Facsimile: (408) 283-7010

7 Attorneys for Defendants
8 NATHAN KENNEDY; JOSH BROWN;
9 KENNEDY MARKETING SYSTEMS, INC.;
REI EDUCATION COMPANY;
FUNNEL ARCHITECTS, LLC

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

14 US TAX LIEN ASSOCIATION, LLC,
15 Plaintiff,
16 v.

17 KENNEDY MARKETING SYSTEMS, INC.;
18 REI EDUCATION COMPANY; FUNNEL
19 ARCHITECTS, LLC; NATHAN KENNEDY;
and JOSH BROWN,

20 Defendants.

CASE NO. CV13-00619 CRB

**STIPULATION AND ORDER
CONTINUING CASE
MANAGEMENT CONFERENCE**

21 WHEREAS, the Complaint in this action was filed in this Court on February 12, 2013.

22 WHEREAS, the Defendants filed their Answer to the Complaint on April 1, 2013.

23 WHEREAS, the Court set the Initial Case Management Conference for May 24, 2013, at
8:30 a.m., on April 9, 2013

24 WHEREAS, the parties have not previously requested any continuation or extension of
time from the Court.

25 WHEREAS, the requested continuance will not affect any other scheduled dates.

14051B58.doc

STIPULATION CONTINUING
CASE MANAGEMENT CONFERENCE
CASE NO. CV13-00619 CRB

WHEREAS, the parties have agreed in principle to a settlement of the entire matter as to all parties.

WHEREAS, the parties anticipate finalizing the settlement agreement and all documentation within the next 30 days at which time the parties will request a stipulated permanent injunction and dismissal of the entire action.

WHEREAS, the parties mutually agree to a continuation of the Case Management Conference of 30 days to allow for the finalization of the settlement in order to increase judicial efficiency.

THEREFORE, Plaintiff US TAX LIEN ASSOCIATION, LLC, and Defendants NATHAN KENNEDY, JOSH BROWN, KENNEDY MARKETING SYSTEMS, INC., REI EDUCATION COMPANY and FUNNEL ARCHITECTS, LLC, by and through their respective counsel, do hereby STIPULATE and agree that the Initial Case Management Conference be continued 30 days, from May 24, 2013, to a date convenient for the Court not earlier than June 24, 2013.

IT IS SO STIPULATED.

Dated: May 23, 2013

PILLSBURY WINTHROP SHAW PITTMAN

By: /s/ *Jenna F. Karadbil*

JENNA F. KARADBIL
Attorneys for Plaintiff

Dated: May 23, 2013

TINGLEY PIONTKOWSKI LLP

By: /s/ *Kevin W. Isaacson*

**KEVIN W. ISIAHSON
Attorneys for Defendants**

IT IS SO ORDERED.

Dated: May 23, 2013

