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5	Attorneys for Plaintiff COMPLIANCE SERVICES OF AMERICA, LLC
6	SERVICES OF AMERICA, LLC
7	UNITED STATES DISTR

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

COMPLIANCE SERVICES OF AMERICA, LLC, a Nevada Limited Liability Company,

Plaintiff,

VS.

HOUSER HOLDINGS, LLC, a California Limited Liability Company, TERESA THURMAN, an individual, and DOES 1 through 10, inclusive,

Defendants.

Case No. 13 CV 01269 JST Honorable Jon S. Tigar, Ctrm. 9

STIPULATION AND FROPOSEDS ORDER TO CONTINUE THE FACT DISCOVERY CUT OFF BY 30 DAYS TO PERMIT THE PARTIES TO FINALIZE SETTLEMENT

Date Action Filed: March 21, 2013

WHEREAS, the parties jointly stipulate that there is good cause for a 30-day extension of the fact discovery cut off so that they can consummate their settlement agreement reached at mediation. This stipulation is based on the following:

- 1. Pursuant to the Court's October 9, 2013 scheduling order ("Scheduling Order"), the parties engaged in a mediation in San Francisco before mediator Martin Quinn of JAMS on January 13, 2014;
- 2. At the mediation, the parties reached a tentative settlement, which was conditioned on the execution of a written settlement agreement, and input from certain third parties, including accountants and other professionals;

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- 3. 1 The parties have received input from their third party consultants, 2 exchanged drafts of a written settlement, and are hopeful that they will be able to 3 execute the settlement agreement within the next week; 4 4. In light of the apparent settlement, the parties have agreed to hold off on 5 further discovery, including depositions of the parties' principals; 5. 6 The Scheduling Order set a March 7, 2014 fact discovery cut off; 7 6. The parties agree that, in order to facilitate and encourage their settlement 8
 - efforts and to avoid additional unnecessary litigation costs, good cause exists to extend the fact discovery cut off for 30 days up to and including April 7, 2014;

 7. This extension of time to complete fact discovery is not sought for

purposes of delay, and cannot and will not be used directly or indirectly to prejudice

any rights of any party; and8. This extension of time will not alter any other event or deadline already fixed by the Court.

For these reasons, the parties respectfully request that the Court continue the fact discovery cutoff until April 7, 2014.

By: /s/ Antony Buchignani
Antony Buchignani

Attorneys for Plaintiff COMPLIANCE

SERVICES OF AMERICA, LLC

IT IS SO STIPULATED.

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DATED: February 25, 2014 THEODORA ORINGHER PC

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1	DATED: February 25, 2014 GREENFIELD SULLIVAN DRAA & HARRINGTON LLP
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3	By: /s/ Gregory Rougeau
4	Gregory Rougeau Attorneys for TERESA THURMAN and
5	HOUSER HOLDINGS, LLC
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8	<u>ORDER</u>
9	Upon consideration of the parties' Stipulation, the Court orders as follows:
10	1. The Stipulation is hereby APPROVED;
11	2. The fact discovery cutoff presently scheduled for March 7, 2014 is hereby
12	extended to April 7, 2014.
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14	DATED: February 26, 2014.
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16	TOY TOY IS THE TO
17	HON. JON S. TIGAR UNITED STATES DISTRICT COURT
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