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6 PETER LLOYD, and
VENTOR PROGRESS AB

7
8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 PETER LLOYD, an individual,
VENTOR PROGRESS AB a
12 Swedish Limited Company,

13 Plaintiff,

14 vs.

15 MIKAEL SJÖBLOM, an
individual, EURO OFFICE
16 AMERICAS, INC. a Delaware
corporation, and DOES 1 through
17 20, inclusive,

18 Defendants.

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20 EURO OFFICE AMERICAS,
INC., a Delaware corporation

21 Cross-claimant,

22 vs.

23 PETER LLOYD, an individual,
VENTOR PROGRESS AB a
24 Swedish Limited Company,
ROES 1 through 20, inclusive

25 Cross-defendants.
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CASE NO.: CV-14-0234 (JSC)

**NOTICE OF CONDITIONAL
SETTLEMENT AND JOINT
STIPULATION TO VACATE
ALL DATES AND SET
FURTHER STATUS
CONFERENCE**

Complaint Filed: January 15, 2014

STIPULATION

1 **TO THIS HONORABLE COURT:**
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3 **RECITALS**

4 **WHEREAS**, on May 30, 2014, this Court entered a Civil Pretrial Order,
5 pursuant to which: (1) initial expert witness disclosures are due on or before
6 September 1, 2014; (2) rebuttal expert witness disclosures are due on or before
7 September 14, 2014; and (3) the expert discovery cut-off is October 14, 2014;

8 **WHEREAS**, on September 11, 2014, the Parties agreed to continue the
9 expert witness disclosure and cut-off by an additional thirty (30) days;

10 **WHEREAS**, on October 13, 2014, the Parties entered into a settlement
11 agreement wherein a series of events must take place within the next 30 days to
12 effect the terms of the settlement agreement;

13 **WHEREAS**, if all of the events contemplated by the settlement agreement
14 occur, the Parties have agreed to dismiss the entire action, including the pending
15 Complaint and Cross-Complaint; and

16 **WHEREAS**, if these events do not occur, the settlement agreement provides
17 that the Parties shall proceed towards a trial in this matter.
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19 **STIPULATION**

20 The Parties, through their counsel of record, hereby stipulate and agree to the
21 following amendments to this Court's Civil Pretrial Order:
22

- 23 1. All pending dates, including the trial date, are hereby vacated;
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25 2. The Court shall set a status conference for November 20, 2014 regarding
26 status of settlement and dismissal of action; and
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28 3. If the matter is not dismissed on or before the November 20, 2014 status
conference, the Court shall set a new trial date, discovery cutoff date,
expert witness cutoff date, etc. at that conference.

1 **IT IS SO STIPULATED.**

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3 Dated: October 20, 2014

BOREN, OSHER & LUFTMAN, LLP

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6 By: /s/ Stephen Z. Boren
7 STEPHEN Z. BOREN
8 Attorneys for Plaintiffs and Cross-
9 Defendants

10
11 Dated: October 20, 2014

TIMOTHY THOMAS O'CONNOR

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13
14 By: /s/ T. O'Connor
15 Attorney for Defendants and Cross-
16 Complainants

17
18 **[PROPOSED] ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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21
22 DATED: October 27, 2014

Jacqueline S. Corley
23 JACQUELINE SCOTT CORLEY
24 United States Magistrate Judge
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