

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
 A Limited Liability Partnership  
 2 Including Professional Corporations  
 CHARLES L. KREINDLER, Cal. Bar No. 119933  
 3 ANTHONY N. MOSHIRNIA, Cal. Bar No. 254253  
 333 South Hope Street, 43<sup>rd</sup> Floor  
 4 Los Angeles, California 90071-1422  
 Telephone: 213.620.1780  
 5 Facsimile: 213.620.1398  
 Email: ckreindler@sheppardmullin.com  
 6 amoshirnia@sheppardmullin.com

7 Attorneys for Lucy Gao (erroneously sued  
 herein as “Lucy Gao, aka Xiang Xin Gao”)  
 8 and HK Grace Building LLC

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 JD BROTHERS LLC, a California Limited  
 13 Liability Company; WEI “WENDY”  
 HUANG, an individual; and WEI  
 14 “WENDY” HUANG as TRUSTEE of the  
 GUO/HUANG FAMILY TRUST, a  
 15 California trust,

16 Plaintiffs,

17 v.

18 LIBERTY ASSET MANAGEMENT  
 CORPORATION; BENJAMIN KIRK, aka  
 19 BENNY KO, aka TZU PING KO; LUCY  
 GAO, aka XIANG XIN GAO; SUNSHINE  
 20 VALLEY LLC; HK GRACE BUILDING  
 LLC; and DOES 1-20,

21 Defendants.  
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Case No. 3:15-cv-01373-VC

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND TIME TO  
 RESPOND TO AMENDED  
 COMPLAINT**

Judge: Hon. Vince Chhabria  
 Crtrm.: 4, 17th Floor

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1 **RECITALS**

2 WHEREAS, on March 25, 2015, Plaintiff JD Brothers LLC (“JD Brothers”) filed  
3 its complaint in this action, in response to which Defendants timely filed motions to  
4 dismiss, which were fully briefed and set for hearing on July 17, 2015;

5 WHEREAS, the law firm of Cotchett, Pitre & McCarthy LLP was retained by JD  
6 Brothers after it had filed its opposition to the motions to dismiss and, on June 15, 2015,  
7 the firm filed an Association of Counsel and Notices of Appearances for Joseph W.  
8 Cotchett and Nancy L. Fineman;

9 WHEREAS, the parties stipulated and the Court entered an Order on June 26, 2015  
10 to (1) take off calendar the then-pending motions to dismiss, (2) permit JD Brothers to file  
11 an amended complaint, and (3) set August 31, 2015 as Defendants’ deadline to respond to  
12 the amended complaint;

13 WHEREAS, JD Brothers filed its amended complaint on July 27, 2015, which  
14 added new parties as Plaintiffs and dismissed certain parties as Defendants;

15 WHEREAS, on August 11, 2015 the Court entered an Order permitting then-  
16 counsel for Defendants Benny Ko, Liberty Asset Management Corporation, and Sunshine  
17 Valley LLC (the “Ko Defendants”) to withdraw from the action, and such counsel did  
18 withdraw;

19 WHEREAS, the Ko Defendants retained the law firm of Robinson & Wood, Inc.,  
20 and Jesse F. Ruiz filed a Notice of Appearance as attorney of record in this action for the  
21 Ko Defendants on August 13, 2015;

22 WHEREAS, prior to and during the telephonic case management conference held  
23 on August 18, 2015, and in subsequent communications, counsel for the parties agreed in  
24 the interests of efficiency and economy to extend Defendants’ deadline to respond to the  
25 amended complaint;

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**PROPOSED ORDER**

PURSUANT TO STIPULATION OF THE PARTIES AND GOOD CAUSE

APPEARING:

1. The deadline for all Defendants to respond to Plaintiffs' amended complaint is continued from August 31, 2015 to September 21, 2015;
2. Plaintiffs' opposition to any motion(s) to dismiss the amended complaint must be filed by October 13, 2015;
3. Defendants' reply in support of any motion(s) to dismiss the amended complaint must be filed by October 20, 2015; and
4. The hearing on any motion(s) to dismiss the amended complaint is set for November 19, 2015.

**IT IS SO ORDERED.**

DATED: August 28, 2015



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VINCE CHHABRIA  
UNITED STATES DISTRICT JUDGE