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6
 7 UNITED STATES DISTRICT COURT

8
 9 NORTHERN DISTRICT OF CALIFORNIA

10 JW GAMING DEVELOPMENT, LLC, A

CASE NO. 3:18-cv-02669-WHO (RMI)

11 CALIFORNIA LIMITED LIABILITY
 COMPANY,

12 Plaintiff,

13 v.

**STIPULATION TO CONTINUE
 DEADLINE TO COMPLETE PARTIAL
 SETTLEMENT RE JOHN TANG AND
 HEARING ON MOTION TO DISMISS
 (DKT. NO. 249) AND ORDER
 THEREON**

14 ANGELA JAMES; LEONA L. WILLIAMS;
 MICHAEL R. CANALES; MELISSA M.

Courtroom 2, 17th Floor
 Hon. William H. Orrick

15 CANALES; JOHN TANG; PINOLEVILLE
 POMO NATION, A FEDERALLY-

16 RECOGNIZED INDIAN TRIBE;
 PINOLEVILLE GAMING AUTHORITY;

17 PINOLEVILLE GAMING COMMISSION;
 PINOLEVILLE BUSINESS

18 BOARD; PINOLEVILLE ECONOMIC
 DEVELOPMENT, LLC; A CALIFORNIA

19 LIMITED LIABILITY COMPANY; LENORA
 STEELE; KATHY STALLWORTH;

20 MICHELLE CAMPBELL; JULIAN J.
 MALDONADO; DONALD WILLIAMS;

21 VERONICA TIMBERLAKE; CASSANDRA
 STEELE; JASON EDWARD RUNNING

22 BEAR STEELE; ANDREW STEVENSON;
 CANALES GROUP, LLC, A CALIFORNIA

23 LIMITED LIABILITY
 COMPANY; LORI J. CANALES; KELLY L.

24 CANALES; AND DOES 1 THROUGH 20,

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Defend
ants.

STIPULATION

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Plaintiff, John Tang, and Tribal Defendants, by and through their undersigned counsel, hereby stipulate and agree as follows:

1. WHEREAS, Defendant and Counterclaim Defendant John Tang filed a motion to dismiss all claims against him in this action (Dkt. No. 249) (“Tang’s Motion”) which is currently scheduled to be heard by the Court at 2:00 p.m. on February 10, 2021;
2. WHEREAS, the parties hereto have reached agreement on the terms of a settlement, reduced them to writing, and all counsel have approved the terms of the settlement agreement;
3. WHEREAS, undersigned counsel for the Tribal Defendants is in the process of gathering all of the required signatures from all of the tribal Defendants, but has encountered some delays due to the fact that some clients are no longer affiliated with the Tribe and/or have had some health and scheduling/availability issues;
4. WHEREAS, undersigned counsel for the Tribal Defendants believes he should be able to obtain the remaining necessary signatures on the settlement agreement within the next seven (7) days;
5. WHEREFORE, the parties hereto have agreed to further postpone the hearing and advising the Court of the consummated settlement agreement for seven (7) days, or as otherwise convenient for the Court.

Dated: February 3, 2021

Fredericks, Peebles & Patterson LLP

By: /s/ Gregory M. Narvaez

Gregory M. Narvaez

Attorneys for Plaintiff

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Dated: February 3, 2021

Prometheus Partners L.L.P.

By: /s/ Eduardo G. Roy

Eduardo G. Roy

Attorneys for Tribal Defendants

Law Offices of Duncan S. James

Dated: February , 2021

By: /s/ Douglas Losak

Douglas L. Losak

Attorneys for John Tang

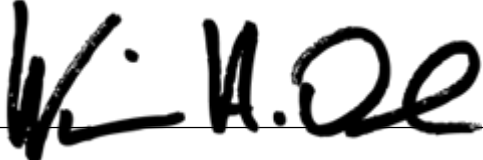
PROPOSED ORDER

Based on the foregoing stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that the motion to dismiss filed by John Tang (Dkt. No. 249) shall be, and hereby is, continued to February 17, 2021 at 2:00p.m. in this Courtroom. The parties shall advise the Court of the status of the settlement agreement execution no later than February 10, 2021.

IT IS SO ORDERED.

Dated: February 4, 2021



JUDGE OF THE NORTHERN DISTRICT COURT