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 5

6 Attorneys for Defendants,  
 ADVANCE CULTURAL EDUCATION AND  
 TRAINING CORPORATION, a California  
 7 corporation, NAPAT VORAPUVADOL A/K/A  
 NAWACHOL BOONTHAM, NARIN  
 8 NATHRADOL, A/K/A MONNOPA  
 KOMOLKETRUCK, and SUPAWADEE  
 9 POONDEJ

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 OAKLAND DIVISION  
 13

14 I.E.I. COMPANY LIMITED, a  
 Thailand corporation;  
 15 INTERNATIONAL EDUCATION ,  
 INC., a Seychelles corporation,,  
 16

17 Plaintiffs,

18 v.

19 ADVANCE CULTURAL  
 EXCHANGE TRAINING  
 CORPORATION, a California  
 20 corporation, initially named herein as  
 "Advance Cultural Education and  
 21 Training Corporation", NAPAT  
 VORAPUVADOL, a/k/a Nawachol  
 22 Boontham, an individual; NARIN  
 NATHRADOL, a/k/a Monnipa  
 23 Komolketruck, an individual;  
 SUPAWADEE POONDEJ, a/k/a  
 24 Supavadee Poondej, an individual;  
 DOES 1 through 10, inclusive,,  
 25

26 Defendants.

Case No. 4:09-CV-05079 PJH

**STIPULATION TO CONTINUE  
 JULY 7, 2010 HEARING ON  
 MOTION TO TRANSFER VENUE;  
 DECLARATION IN SUPPORT  
 THEREOF; ORDER THEREON  
 [PROPOSED]**

27 Defendants, Napat Vorapuvadol, Narin Nathradol, Supawadee Poondej and

28 Advance Cultural Exchange Training Corporation ("Defendants") and Plaintiffs,

1 I.E.I. Company Limited and International Education, Inc. ("Plaintiffs"), by and  
2 through their undersigned counsel, stipulate and agree as follows:

3  
4 Pursuant to Civil Local Rules 6-1(b), 6-2(a) and (b), 7-7(b) and (d), the  
5 parties, by and through their respective attorneys of record, hereby stipulate and  
6 agree that the hearing date on Defendants' Motion to Transfer Venue be continued  
7 until Wednesday, August 18, 2010 and that Defendants' Reply, if any, be continued  
8 pursuant to Civil Local Rule 7-7(d). Defendants' counsel will be out of state (in  
9 Texas) in the middle of July.  
10

11  
12 This stipulation is made upon the following grounds and based on the  
13 following facts and events:

14  
15 1. On Wednesday, May 26, 2010, the parties participated in a lengthy  
16 mediation session conducted by Mediator Stewart H. Foreman in Department No.  
17 17 of the United States District Court, located at 450 Golden Gate Avenue.  
18 Substantial progress to resolving the subject litigation was then made. Settlement  
19 discussions have continued and are on-going; drafts of the Settlement Agreement  
20 have been exchanged and discussed at length; negotiations, however, have taken  
21 longer than expected due to clients being in different international time zones. As  
22 before, the parties continue to wish to direct their limited time and resources to this  
23 task.  
24

25  
26 2. Defendants' Motion to Transfer Venue was filed on May 10, 2010.  
27  
28 Plaintiffs filed their Opposition on May 26, 2010. The parties submitted one (1)

1 request to continue this hearing. This Court granted same on June 1, 2010.

2 Hearing is currently set thereon for July 7, 2010. Defendants' Reply is not yet due.

3  
4 3. As referenced above, the parties hereto have made one (1) prior  
5 request for a continuance of this hearing or Motion and this Court granted same.

6  
7 4. The only other Stipulation previously requested by the parties in this  
8 matter was on December 30, 2009. There, the parties sought leave for Plaintiffs' to  
9 file their Second Amended Complaint and an extension of time to respond to same.  
10 This Court granted said Stipulation on January 13, 2010.

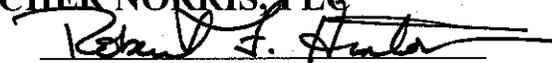
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12 5. This immediate Stipulation is requested in good faith and based on the  
13 facts above and the attendant Declaration of Robert F. Hinton.

14 6. Respectfully, it is requested that this Stipulation be granted.

15  
16 Dated: June 17, 2010

Respectfully submitted,

**ARCHER NORRIS, PLLC**

By: 

Robert F. Hinton

Attorneys for Defendants, Napat  
Vorapuvadol, Narin Nathradol,  
Supawadee Poondej and  
Advance Cultural Training  
Corporation

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21  
22 Dated: June 17, 2010

Respectfully submitted,

**KRONENBERGER BURGOUYNE, LLP**

By: /s/ Karl S. Kronenberger (per consent)

Karl S. Kronenberger

James V. Weixel, Jr.

Attorneys for Plaintiffs,  
I.E.I. Company Limited and  
International Education, Inc.

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**ORDER**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Defendants' Motion to Transfer Venue is hereby continued to Wednesday, August 18, 2010, at 9:00 a.m. in Department 3 of this Court;
  2. Defendants' Reply, if any, is due pursuant to Civil Local Rule 7-7(d);
- and,
3. Should the parties reach settlement in this matter, they will promptly notify this Court of same, as required by Civil Local Rule.

**Dated: June 18, 2010**

**The Honorable Phyllis E. Hamilton  
United States District Judge**

