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7 **Attorneys for Defendants,**
8 **ADVANCE CULTURAL EDUCATION AND**
9 **TRAINING CORPORATION, a California**
10 **Corporation, NAPAT VORAPUVADOL a/k/a/**
11 **Nawachol Boontham, an individual; NARIN**
12 **NATHRADOL, a/k/a/ Monnipa Komolketruck,**
13 **an individual; SUPAWADEE POONDEJ, a/k/a/**
14 **Supavadee Pondej**

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UNITED STATES DISTRICT COURT
NORTHERN DISCTRICT OF CALIFORNIA
OAKLAND DIVISION

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

Plaintiffs,

v.

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

Defendants

Case No.: 4:09-CV-05079 PJH

**STIPULATION TO CONTINUE
OCTOBER 28, 2010 HEARING ON
MOTION FOR ORDER TO SHOW
CAUSE FILED BY PLAINTIFFS;
DECLARATION IN SUPPORT
THEREOF; ORDER THEREON
[PROPOSED]**

1 Defendants, Napat Vorapuvadol, Narin Nathradol, Supawadee Poondej and Advance
2 Cultural Exchange Training Corporation ("ACET") and Plaintiffs, I.E.I. Company Limited and
3 International Education, Inc. ("Plaintiffs"), by and through their counsel, stipulate and agree as
4 follows:

5 Pursuant to Civil Local Rules 6-1(b), 6-2(a) and (b), 7-7(b) and (d), the parties, by and
6 through their respective attorneys of record, hereby stipulate and agree that the hearing date on
7 Plaintiff's Motion for Order to Show scheduled for October 28, 2010 at 10:00 a.m. be continued
8 to 2:30 p.m.

9 This stipulation is made upon the following grounds and based on the following facts and
10 events:
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12 1. On October 7, 2010, the parties participated in a telephonic discovery conference
13 whereby Defendants were ORDERED TO SHOW CAUSE on October 28, 2010 at 10:00 a.m.
14 before Magistrate Judge Beeler at 1201 Clay Street, Courtroom 4, Third Floor, Oakland,
15 California 94612, why sanctions should not be imposed upon Defendants for Defendants' failure
16 to respond to (1) I.E.I.'s First Set of Interrogatories to Defendant Advance Cultural Exchange
17 Training Corporation; (2) I.E.I.'s First Set of Interrogatories to Defendant Napat Vorapuvadol;
18 (3) I.E.I.'s First Set of Requests for Production of Documents to Defendant Advance Cultural
19 Exchange Training Corporation; (4) I.E.I.'s First Set of Requests for Production of Documents to
20 Defendant Napat Vorapuvadol; (5) I.E.I.'s First Set of Requests for Production of Documents to
21 Defendant Narin Nathradol; and (6) I.E.I.'s First Set of Requests for Production of Documents to
22 Defendant Supawadee Poondej.
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1 2. On October 8, 2010, it was discovered that the lead attorney, Au Lang T.N. Le, is
2 scheduled to have four (4) matters that morning in The Superior Court Of The State Of
3 California In And For The County Of San Bernardino Juvenile Division.

4 3. The parties agreed to continue the hearing to 1:30 p.m. on October 28, 2010.
5 However, Defendants' counsel was advised this Court will be unavailable until 2:30 pm. on
6 October 28, 2010.

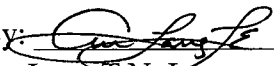
7 4. This immediate Stipulation is requested in good faith and based on the facts above and
8 the Declaration of Au Lang T.N. Le.

9 5. Respectfully, it is requested that this Stipulation be granted.

10 Dated: October 12, 2010

Respectfully submitted

LE, CLARK & HO, LLP

13 By: 
14 Au Lang T.N. Le

15 Attorneys for Defendants, Advance Cultural
16 Education and Training Corporation, a
17 California Corporation, Napat Vorapuvadol,
18 a/k/a/Nawachol Boontham, an individual;
19 Narin Nathradol, a/k/a/ Monnipa
20 Komolketruck, an individual; Supawadee
21 Poondej, a/k/a/ Supavadee Poondej

22 Dated: October 12, 2010

Respectfully submitted,

KRONENBERGER BURGOUYNE, LLP

23 By: _____
24 Karl S. Kronenberger
25 James V. Weixel, Jr.
26 Attorneys for Plaintiffs, I.E.I. Company
27 Limited and International Education, Inc.
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ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Plaintiffs' Motion for Order to Show Cause is hereby continued to Thursday, October 28, 2010, at 2:30 p.m. in Courtroom 4 of this Court.
2. Should the parties reach settlement in this matter, they will promptly notify this Court of same, as required by Civil Local Rule.

Dated: October 20, 2010

