

1 Daniel S. Mount, Esq. (Cal. Bar No. 77517)  
 Daniel H. Fingerman, Esq. (Cal. Bar No. 229683)  
 2 Mount & Stoelker, P.C.  
 RiverPark Tower, Suite 1650  
 3 333 West San Carlos Street  
 San Jose CA 95110-2740  
 4 Phone: (408) 279-7000  
 Fax: (408) 998-1473  
 5 Email: dmount@mount.com, dfingerman@mount.com  
 6

7 Jason M. Drangel, Esq. (admitted *pro hac vice*)  
 Epstein Drangel Bazerman & James, LLP  
 8 60 East 42nd St Ste 820  
 New York NY 10165  
 9 Phone: (212) 292-5390  
 Fax: (212) 292-5391  
 10 Email: jdrangel@ipcounselors.com

11 Attorneys for Ontel Products Corporation

MOUNT & STOELKER, P.C.  
 RIVERPARK TOWER, SUITE 1650  
 333 WEST SAN CARLOS STREET  
 SAN JOSE, CALIFORNIA 95110-2740  
 TELEPHONE (408) 279-7000

United States District Court  
 Northern District of California

12  
 13  
 14  
 15 Ontel Products Corporation  
 16 Plaintiff

) Case No. 4:10-00386-PJH  
 ) U.S. Judge Phyllis J. Hamilton

17 vs.

) **Stipulation To Extend Case Management Dates**  
 ) **and [Proposed] Order**

18 Beijing Dunhuang Huguang Information  
 19 Technology Co. Ltd.; Mei Fu Luo; and  
 United Logistics Solutions Inc.

20 Defendants  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 Plaintiff Ontel products Corporation and Defendants Beijing Dunhuang Huguang Information  
2 Technology Co. Ltd.; Mei Fu Luo; and United Logistic Solutions Inc. stipulate as follows:

3 1. Defendants Mei Fu Luo; and United Logistic Solutions Inc. were served on February  
4 6, 2010 and February 8, 2010, respectively.

5 2. Defendant Beijing Dunhuang Huguang Information Technology Co. Ltd. was not yet  
6 served.

7 3. All parties have reached an agreement in principle to settle this case and are working  
8 to prepare a formal settlement agreement and a stipulated dismissal.

9 4. Plaintiff has informally extended the defendants (except Beijing Dunhang who has  
10 still not been served) time to answer the complaint, so that the parties could discuss settlement.

11 5. All parties now request an extension of the case management dates, so that they can  
12 finalize the settlement agreement and the stipulated judgment without incurring the extra costs  
13 associated with counsel preparing a joint case management report and attending the case management  
14 conference. The parties still intend to resolve this case by their settlement agreement and stipulated  
15 dismissal by June 30, 2010. The parties believe they can do so, which would avoid the need for a  
16 case management conference.

17 6. The present case management deadlines, were set by the court's initial scheduling  
18 order on March 9, 2010:

19 a. May 6, 2010: Last day to file Rule 26(f) Report, complete initial disclosures or  
20 state objection in Rule 26(f) Report and file Case Management Statement per  
21 attached Standing Order re Contents of Joint Case Management Statement

22 b. May 13, 2010: INITIAL CASE MANAGEMENT CONFERENCE (CMC).

23 7. The parties request that the case management deadlines be extended as follows:

24 a. July 22, 2010: Last day to file Rule 26(f) Report, complete initial disclosures  
25 or state objection in Rule 26(f) Report and file Case Management Statement  
26 per attached Standing Order re Contents of Joint Case Management Statement.

27 b. July 29, 2010: INITIAL CASE MANAGEMENT CONFERENCE (CMC).  
28

1 It is so stipulated:

2 Date: April 30, 2010

Mount & Stoelker, P.C.,  
/s/ Dan Fingerman  
Attorneys for Plaintiff Ontel Products Corporation

4 Date: April 30, 2010

/s/ Bart Selden  
Attorneys for Defendant United Logistic  
Solutions, Inc.

6 Date: April 30, 2010

/s/ James Cai  
Attorneys for Defendant Mei Fu Luo

9 As the attorney electronically filing this document, I attest that my co-counsel, Jason Drangel,  
10 informs me that Bart Selden, James Cai and Frances Bivens (counsel for Beijing Dunhang) have  
11 concurred in this filing.

12 Date: April 30, 2010

Mount & Stoelker, P.C.,  
/s/ Dan Fingerman  
Attorneys for Plaintiff Ontel Products Corporation

16 Pursuant to stipulation, IT IS SO ORDERED.

17 Date: 5/4/10

U.S. District Judge Phyllis J. Hamilton



MOUNT & STOELKER, P.C.  
RIVERPARK TOWER, SUITE 1650  
333 WEST SAN CARLOS STREET  
SAN JOSE, CALIFORNIA 95110-2740  
TELEPHONE (408) 279-7000