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10 Attorneys for Defendants JOHN VARVATOS ENTERPRISES, INC.;  
 JOHN VARVATOS and BLOOMINGDALE'S, INC.

11  
 12 UNITED STATES DISTRICT COURT

13  
 14 NORTHERN DISTRICT OF CALIFORNIA

15  
 16 JIM MARSHALL PHOTOGRAPHY LLC,

17 Plaintiff,

18 vs.

19 JOHN VARVATOS, INC., a Delaware  
 20 corporation; JOHN VARVATOS, an  
 individual; and BLOOMINGDALE'S, INC., a  
 21 Delaware corporation,

22 Defendants.

Case No. CV11-6702-DMR

**STIPULATION TO CONTINUE  
 FURTHER CASE MANAGEMENT  
 CONFERENCE; [~~PROPOSED~~] ORDER**

**Date: August 22, 2012**  
**Time: 1:30 p.m.**  
**Courtroom: Courtroom 4, 3<sup>rd</sup> Floor**  
**The Hon. Donna M. Ryu**

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 25 The parties, by and through their counsel, hereby stipulate that the Case Management  
 26 Conference, presently set for August 22, 2012 be continued for one week to August 29 at 1:30  
 27 P.M., or at another date convenient for the court. The basis of the request is set forth in the  
 28 accompanying declaration of Lawrence G. Townsend, as required by L.R. 6-2, and is as follows:

1           1.       The parties completed the mediation through the court-appointed mediator on  
2 July 18, have prior to and since then been diligently exchanging paper discovery, and since the  
3 mediation have been working diligently to schedule depositions.

4           2.       Three depositions needed to be scheduled in New York the week of August 20,  
5 the only week that would work, to accommodate all the various schedules, but the Case  
6 Management Conference is presently scheduled for Wednesday, August 22, 2012 at 1:30 P.M.

7  
8           Accordingly, the parties respectfully request that the current Case Management  
9 Conference be rescheduled for August 29, 2012 at 1:30 P.M. and that the due date of an updated  
10 Joint Case Management Conference Statement be due on August 22, 2012.

11 Dated: August 14, 2012

LAW OFFICES OF LAWRENCE G. TOWNSEND

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13  
14 By: /s/ Lawrence G. Townsend

Lawrence G. Townsend

15 Attorneys For Plaintiff JIM MARSHALL  
16 PHOTOGRAPHY LLC

17 Dated: August 14, 2012

DYKEMA GOSSETT LLP

18  
19  
20 By: /s/ S. Christopher Winter

S. Christopher Winter

21 Attorneys For Defendants JOHN VARVATOS  
22 ENTERPRISES, INC.; JOHN VARVATOS and  
23 BLOOMINGDALE'S, INC.

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: August 15, 2012

By: \_\_\_\_\_

