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Attorneys for Defendants
DAVID CHIU, JUNG MIN MOK, SANGCHOL AN, CHANG K. CHANG,
YONG OH CHOI, TONY HUEY, JUNG KIM AND BHUPENDRA PATEL

DISTRICT COURT OF THE UNITED STATES
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER
FOR INNOVATIVE BANK,

Plaintiff,

vs.

SEONG HOON HONG; DAVID
CHIU; JIN YOUNG KIM (AKA
JIMMY KIM); JUNG MIN MOK;
YOUNG HO WON; SANGCHOL
AN; CHANG K. CHANG; SUNG
SANG CHO; HARRY MOOK CHOI;
YONG OH CHOI; TONY HUEY;
CHONG KIM; JUNG KIM;
BHUPENDRA PATEL

Defendants.

CASE NO.: CV12-2658 LB

**STIPULATION REQUESTING
ORDER CONTINUING FACT
DISCOVERY CUT-OFF FOR
TWO WEEKS FOR THE SOLE
PURPOSE OF COMPLETING
ALREADY NOTICED
DEPOSITIONS**

WHEREAS on May 15, 2013, Defendants requested depositions of three
FDIC employees and a 30(b)(6) deposition of the FDIC;

STIPULATION REQUESTING ORDER CONTINUING FACT DISCOVERY CUT-OFF -- CV12-2658 LB

1 WHEREAS the schedules of counsel and the witnesses have not been able to
2 accommodate depositions dates before the fact discovery cut-off of June 28, 2013;

3 WHEREAS the parties agree to a short extension of the fact discovery cut-
4 off for purposes of completing the already noticed depositions of the FDIC and its
5 witnesses;

6 WHEREAS the short extension will not interfere with other scheduled dates
7 in this matter;

8 WHEREAS granting a short extension will avoid unnecessary discovery
9 motion practice;

10 IT IS HEREBY STIPULATED by and between the parties through their
11 designated counsel that fact discovery cut-off date of June 28, 2013 be continued
12 to July 12, 2013 for the sole purpose of completing currently noticed depositions.

13 Dated: June 11, 2013

Respectfully submitted,

14 KIM, SHAPIRO, PARK & LEE

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16 By: /s/ Steven E. Shapiro

17 Attorneys for Defendants
18 DAVID CHIU, JUNG MIN MOK,
19 SANGCHOL AN, CHANG K.
20 CHANG, YONG OH CHOI,
21 TONY HUEY, JUNG KIM and
22 BHUPENDRA PATEL
23 *Hong et al. v. Chartis Specialty*
24 *Insurance Company*, Case No.
25 *C 13-777 CW; Hong v. Chartis*
26 *Specialty Insurance Company*,
27 Case No. *C 13-01769 CW*; and
28 *Won v. Chartis Specialty Insurance*
Company, Case No. *C 13-1029 CW*

26 The undersigned have given authority to counsel for Chartis Specialty Insurance
27 Company to file this Stipulation and [Proposed] Order on their behalf.
28

1 Dated: June 11, 2013

KIM, SHAPIRO, PARK & LEE

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3
4 By: /s/ Steve E. Shapiro

5 Attorneys for Defendants
6 DAVID CHIU, JUNG MIN MOK,
7 SANGCHOL AN, CHANG K.
8 CHANG, YONG OH CHOI,
9 TONY HUEY, JUNG KIM and
10 BHUPENDRA PATEL

11 Dated: June 11, 2013

PARK & SYLVA

12 By: /s/ Daniel E. Park

13 Attorneys for Plaintiff
14 SEONG HOON HONG

15 Dated: June 11, 2013

NASSIRI & JUNG, LLP

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17 By: /s/ Kassra P. Nassiri

18 Attorneys for Plaintiff
19 YOUNG HO WON

20
21 Dated: June 11, 2013

NIXON PEABODY LLP

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23
24 By: /s/ Anthony J. Barron

25 Attorneys for Plaintiff
26 FEDERAL DEPOSIT
27 INSURANCE CORPORATION
28 AS RECEIVER FOR
INNOVATIVE BANK

1 ~~PROPOSED~~ ORDER

2 Pursuant to Stipulation, it is ordered that the fact discovery in this case be
3 continued from June 28, 2013 to July Case Management Conference in the three
4 Coverage Actions is continued to July 12, 2013, for the sole purpose of completing
5 depositions already noticed.

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7 Dated: 6/19/2013

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10 United States District Court Judge
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