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8 Attorneys for Plaintiff
 FEDERAL DEPOSIT INSURANCE CORPORATION
 9 AS RECEIVER FOR INNOVATIVE BANK

10 UNITED STATES DISTRICT COURT
 11
 12 NORTHERN DISTRICT OF CALIFORNIA
 13
 14 SAN FRANCISCO DIVISION

15	FEDERAL DEPOSIT INSURANCE)	
16	CORPORATION AS RECEIVER FOR)	CV-12-2658 CW
17	INNOVATIVE BANK,)	
18)	STIPULATION AND PROPOSED ORDER
19	Plaintiff,)	CONTINUING PENDING COURT DATES
20)	AND EXPERT DISCOVERY DEADLINES
21	vs.)	
22)	
23	SEONG HOON HONG; DAVID CHIU; JIN)	
24	YOUNG KIM (AKA JIMMY KIM); JUNG)	
25	MIN MOK; YOUNG HO WON;)	
26	SANGCHOL AN; CHANG K. CHANG;)	
27	SUNG SANG CHO; HARRY MOOK)	
28	CHOI; YONG OH CHOI; TONY HUEY;)	
	CHONG KIM; JUNG KIM; BHUPENDRA)	
	PATEL,)	
)	
	Defendants.)	
)	

1 WHEREAS, the parties are engaged in settlement discussions and will attend a mediation
2 with Judge Warren on November 5, 2013;

3 WHEREAS, a Case Management Conference (“CMC”) is currently scheduled in the case for
4 November 7, 2013, and the parties have agreed to continue the CMC date to November 21, 2013 at
5 2:00 p.m.;

6 WHEREAS, the parties have informally resolved a discovery dispute related to expert
7 disclosures and have agreed to amend and/or supplemental the existing expert reports disclosed in the
8 case with Plaintiff’s amended and/or supplemental expert report due on November 8, 2013 and
9 Defendants’ amended and/or supplemental expert report due on November 29, 2013;

10 WHEREAS the current deadline for completion of expert discovery is November 8, 2013;

11 WHEREAS the parties hope to postpone or avoid additional expenses in conjunction with
12 imminent expert discovery deadlines while they further explore the possibility of settlement;

13 WHEREAS the parties agree to a further extend of the expert discovery cut-off date to
14 December 9, 2013;

15 WHEREAS granting the short extensions referenced above may facilitate settlement
16 discussions and avoid unnecessary expenses.

17 IT IS HEREBY STIPULATED by and between the parties through their designated counsel
18 that the new pending dates are continued as follows:

- 19 (1) November 21, 2013 CMC at 2:00 PM before Judge Claudia Wilken;
20 (2) December 9, 2013 for completion of expert discovery.

21
22 Dated: November 1, 2013

Respectfully submitted,

23 **NIXON PEABODY LLP**

24 By: s/ Marcie K. Farano

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

1 The undersigned have given authority to Marcie K. Farano to file this Stipulation and [Proposed]
2 Order on their behalf.

3
4 Dated: November 1, 2013

KIM, SHAPIRO, PARK & LEE

5 By: /s/ Steve E. Shapiro
6 Steve Shapiro, Esq.
7 Attorney for Defendants
8 CHANG K. CHANG, JUNG MIN MOK,
9 YONG OH CHOI, DAVID CHIU, TONY
10 HUEY, JUNG KIM, BHUPENDRA
11 PATEL AND SANGCHOL AN

12
13 Dated: November 1, 2013

PARK & SYLVA

14 By: /s/ Daniel E. Park
15 Daniel Eal Young Park, Esq.
16 Attorney for Defendant
17 SEONG HOON HONG

18
19 Dated: November 1, 2013

NASSIRI & JUNG LLP

20 By: /s/ Kassra Powell Nassiri
21 Kassra Powell Nassiri, Esq.
22 Attorney for Defendant
23 YOUNG HO WON

24
25 Dated: November 1, 2013

LAW OFFICES OF ROBERT LANE

26 By: /s/ Robert Lane
27 Robert Lane, Esq.
28 Attorney for Defendant
HARRY MOOK CHOI

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1 **PROPOSED ORDER**

2 Pursuant to Stipulation, it is ordered that the case management conference and expert related
3 discovery deadlines in the case are continued as follows:

- 4 (1) November 21, 2013 - Case management conference at 2:00 p.m. before Judge Claudia
5 Wilken;
6 (2) December 9, 2013 - Completion of expert discovery.
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9
10 DATED: 11/6/2013


11 Hon. Claudia A. Wilken
12 United States District Court Judge
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