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

1 WHEREAS, the parties have reached a settlement in principal of this matter following a
2 November 5, 2013 mediation with Judge Warren (Ret.);

3 WHEREAS, the parties are now working to reduce the settlement to a written agreement and
4 have agreed to continue pending case dates and deadlines while the settlement and release agreement
5 is being drafted and executed;

6 WHEREAS, a Case Management Conference ("CMC") is currently scheduled for January 23,
7 2014 at 2:00 P.M., at which time the parties expect to report on finalization of the settlement and
8 release agreement;

9 WHEREAS extension of all existing case deadlines and court dates referenced and proposed
10 below will facilitate finalization of the settlement and avoid unnecessary expenses and prevent
11 wasting of judicial resources.

12 IT IS HEREBY STIPULATED by and between the parties through their designated counsel
13 that the following case deadlines and dates be extended as indicated:
14

15 Event	Current Date	Stipulated New Date
16 Defendants' Supplemental Expert Disclosure Due	November 29, 2013	January 28, 2014
17 Close of Expert Discovery	December 9, 2013	February 10, 2014
18 Last Day for Parties to Exchange Joint Pretrial Statement, 19 Motions in Limine, Proposed Voir Dire, Jury Instructions, 20 Forms of Verdict, Briefs, Exhibit and Witness Lists, Proposed Findings of Fact and Conclusions of Law, Trial Materials and Statement Designating Deposition Excerpts and Other Discovery to be Offered at Trial	December 24, 2013	February 25, 2014
21 Pre-trial Disclosures Pursuant to FRCP 26(a)(3)	January 3, 2014	March 4, 2014
22 Parties to Submit Joint Pretrial Conference Statement, 23 Motions in Limine, Pre-Trial Briefs, Joint Proposed Voir 24 Dire, Joint Proposed Jury Instructions, Forms of Verdict, 25 Briefs, Exhibit and Witness Lists, Proposed Findings of Fact and Conclusions of Law, Trial Materials and Statement Designating Deposition Excerpts and other Discovery to be Offered at Trial	January 8, 2014	March 10, 2014
26 Last Day to File any Stipulated Request or Motion for Order Enlarging or Shortening Time Which Affects Trial	January 17, 2014	March 19, 2014
27 Pre-trial conference	January 22, 2014	March 26, 2014
28 Jury Trial (12 day jury trial to commence)	February 3, 2014	April 7, 2014

1
2 Dated: November 20, 2013

Respectfully submitted,

3 **NIXON PEABODY LLP**

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5 By: /s/ Marcie K. Farano

Marcie K. Farano
Attorneys for Plaintiff
FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER FOR
7 INNOVATIVE BANK

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

10
11 Dated: November 20, 2013

KIM, SHAPIRO, PARK & LEE

12 By: /s/ Steve E. Shapiro

13 Steve Shapiro, Esq.
Attorney for Defendants
14 CHANG K. CHANG, JUNG MIN MOK,
YONG OH CHOI, DAVID CHIU, TONY
15 HUEY, JUNG KIM, BHUPENDRA
16 PATEL AND SANGCHOL AN

17 Dated: November 20, 2013

PARK & SYLVA

18 By: /s/ Daniel E. Park

19 Daniel Eal Young Park, Esq.
Attorney for Defendant
20 SEONG HOON HONG

21
22 Dated: November 20, 2013

NASSIRI & JUNG LLP

23 By: /s/ Kassra Powell Nassiri

24 Kassra Powell Nassiri, Esq.
Attorney for Defendant
25 YOUNG HO WON

26 ///

1 Dated: November 20, 2013

LAW OFFICES OF ROBERT LANE

2 By: /s/ Robert Lane
3 Robert Lane, Esq.
4 Attorney for Defendant
5 HARRY MOOK CHOI

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ORDER

Pursuant to Stipulation, it is ordered that all case deadlines and pending court dates are extended as follows:

Event	New Date
Defendants' Supplemental Expert Disclosure Due	January 28, 2014
Close of Expert Discovery	February 10, 2014
Last Day for Parties to Exchange Joint Pretrial Statement, Motions <i>in Limine</i> , Proposed Voir Dire, Jury Instructions, Forms of Verdict, Briefs, Exhibit and Witness Lists, Proposed Findings of Fact and Conclusions of Law, Trial Materials and Statement Designating Deposition Excerpts and Other Discovery to be Offered at Trial	February 25, 2014
Pre-trial Disclosures Pursuant to FRCP 26(a)(3)	March 4, 2014
Parties to Submit Joint Pretrial Conference Statement, Motions <i>in Limine</i> , Pre-Trial Briefs, Joint Proposed Voir Dire, Joint Proposed Jury Instructions, Forms of Verdict, Briefs, Exhibit and Witness Lists, Proposed Findings of Fact and Conclusions of Law, Trial Materials and Statement Designating Deposition Excerpts and other Discovery to be Offered at Trial	March 10, 2014
Last Day to File any Stipulated Request or Motion for Order Enlarging or Shortening Time Which Affects Trial	March 19, 2014
Pre-trial conference	March 26, 2014
Jury Trial (12 day jury trial to commence)	April 7, 2014

DATED: 11/21/2013


Hon. Claudia A. Wilken
United States District Court Judge

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PROOF OF SERVICE

I, the undersigned, certify that I am employed in San Francisco, California; that I am over the age of eighteen years and not a party to the within action; and that my business address is Nixon Peabody LLP, One Embarcadero Center, 18th Floor, San Francisco, CA 94111.

The following document(s):

STIPULATION AND [PROPOSED] ORDER CONTINUING ALL CURRENT CASE DEADLINES AND COURT DATES PENDING FINALIZATION OF SETTLEMENT AGREEMENT

were served on the dates and on the parties stated below, through their attorneys of record, by placing a true copy thereof in sealed envelopes addressed as shown below by the following means of service:

- (BY FACSIMILE) by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- (BY MAIL) by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at San Francisco, California addressed as set forth below.
- (BY OVERNIGHT COURIER) I caused each such envelope to be given to an overnight mail service at San Francisco, California, to be hand delivered to the office of the addressee on the next business day
- (BY COURIER) by placing the document(s) listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to an agent for delivery.
- (BY E-MAIL) by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Addressee(s)

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Steve Shapiro, Esq.
Robert Dart, Esq.
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9
10 I declare under penalty of perjury that the foregoing is true and correct. Executed on
11 November 20, 2013, at San Francisco, California.

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15 Lillian Cardona