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* E-filed 7/28/06 *

5 Attorneys for Defendant,
 6 ENTRUST ADMINISTRATION, INC.

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9 SAN JOSE DIVISION

10 HAIBO CHI, DAFENG CHEN, RUILING
 11 QIN, TYSON LEE, LIMING MA, TAO
 12 JIN, WEI YUAN, XIN ZHOU, YUE XU,
 13 BIAO ZHANG, LI ZHANG, RAN XIAO,
 14 JEFF ZHU, LINDI WANT, EDMOND
 CHEN, ZHEN HAO, XUEPU ZHAO,
 SHU-JANE TAN, HAIYING WANG,
 NING XU,

Case No. C05-01594 RMW

**STIPULATION AND ~~PROPOSED~~
 ORDER GRANTING MOTION OF
 ENTRUST ADMINISTRATION, INC. TO
 VACATE DEFAULT JUDGMENT AND
 SET ASIDE DEFAULT**

15 Plaintiffs,

16 Vs.

17 DIRECT EQUITIES, LLP, DIRECT
 18 EQUITIES, INC. (D.B.A. NATIONWIDE
 19 PROPERTIES), CRAIG N. KIRT, THE
 20 ADMINISTRATOR OF THE ESTATE OF
 21 CRAIG N. KIRT, INGRID KIRT, STEVE
 M. SCOTT, KELLY KINGSLAND, PAUL
 KASPUTIS, ENTRUST
 ADMINISTRATION, INC., DAVID
 WINTER, AND DOES 1-50,

22 Defendants.

23
 24 WHEREAS, the default of Defendant ENTRUST ADMINISTRATION, INC. ("Entrust")
 25 was entered in this matter on June 30, 2005;

26 WHEREAS, a default judgment in the total amount of two hundred thirty thousand dollars
 27 (\$230,000) was entered against Entrust on January 23, 2006;

28 WHEREAS, Entrust has filed a motion to set aside its default and vacate the judgment

1 against it, which motion is scheduled to be heard on August 18, 2006; and

2 WHEREAS, Plaintiffs, HAIBO CHI, DAFENG CHEN, RUILING QIN, TYSON LEE,
3 LIMING MA, TAO JIN, WEI YUAN, XIN ZHOU, YUE XU, BIAO ZHANG, LI ZHANG,
4 RAN XIAO, JEFF ZHU, LINDI WANT, EDMOND CHEN, ZHEN HAO, XUEPU ZHAO,
5 SHU-JANE TAN, HAIYING WANG, and NING XU do not oppose Entrust's motion.

6 WHEREFORE, IT IS HEREBY STIPULATED by and among the parties hereto through
7 their respective counsel that the default judgment entered against Entrust should be vacated and
8 Entrust's default set aside.

9 Dated: July 25, 2006

MANATT, PHELPS & PHILLIPS, LLP

10
11 By: /s/ Christopher L. Wanger
Christopher L. Wanger
12 Attorneys for Defendant,
ENTRUST ADMINISTRATION, INC.

13 Dated: July 25, 2006

SCHEIN & CAI LLP

14
15 By: /s/ James Cai
James Cai
16 Attorneys for Plaintiffs, HAIBO CHI, DAFENG
CHEN, RUILING QIN, TYSON LEE, LIMING
17 MA, TAO JIN, WEI YUAN, XIN ZHOU, YUE
XU, BIAO ZHANG, LI ZHANG, RAN XIAO,
18 JEFF ZHU, LINDI WANT, EDMOND CHEN,
ZHEN HAO, XUEPU ZHAO, SHU-JANE TAN,
HAIYING WANG, NING XU

19 *Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures,*
20 *Christopher L. Wanger hereby attests that concurrence in the filing of this document has been*
obtained.

21 **ORDER**

22 Pursuant to the foregoing stipulation and good cause appearing, IT IS HEREBY
23 ORDERED that that the default judgment entered against Entrust shall be vacated and Entrust's
24 default shall be set aside. Entrust shall answer, move or otherwise respond to the First Amended
25 Complaint in this matter within twenty (20) days of the date below.

26
27 Dated: 7/28, 2006

Ronald M. Whyte
28 Honorable Ronald M. Whyte
United States District Judge