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15	Managed Solutions Group, Inc.	
15	and Steven Chen	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION	
18) Louis Vuitton Malletier, S.A.,	Case No. C07-03952 JW (HRL)
19		
20	Plaintiff,) v.)	JOINT STIPULATION RE CONTINUANCE OF PRELIMINARY
21)	PRETRIAL CONFERENCE
	Akanoc Solutions, Inc., Managed Solutions) Group, Inc., Steven Chen and Does 1 through 10,)	Court: Hon. James Ware
22 23	inclusive,	Date: September 8, 2008 Time: 9:00 a.m.
	Defendants.)	
24	Plaintiff Louis Vuitton Malletier, S.A. ("Vuitton" or "Plaintiff") by and through its counsel	
25	of record and Defendants Akanoc Solutions, Inc., Managed Solutions Group, Inc. and Steven Chen	
26		
27	(collectively referred to as "Defendants"), by and through their counsel of record, agree and stipulate	
28	as follows:	
	Louis Vuitton v. Akanoc, et al.: Stipulation to Continue Prelim.	1 -
	Pretrial Conference	1 -

WHEREAS the Court set a Preliminary Pretrial Conference in the matter on September 8, 2008 at 11:00 a.m.;

WHEREAS on or about May 19, 2008, Defendants filed their Motion for Summary Judgment;

WHEREAS on or about May 20, 2008, the Court Clerk issued its Notice Continuing Motion Hearing for Defendants' Motion for Summary Judgment to September 8, 2008, at 9:00 a.m.;

WHEREAS Plaintiff has filed its Motion for Leave to File a First Amended Complaint and has set its motion for hearing on September 8, 2008 at 9:00 a.m.;

WHEREAS the outcomes of the pending motions may significantly impact trial preparation;

WHEREAS Magistrate Judge Lloyd has recently granted Plaintiff's Motion to Compel which requires production by Defendants by July 31, 2008, failing that, inspection of Defendants' servers according to protocol to be determined;

WHEREAS the Court's Scheduling Order requires that the Parties submit Preliminary Pretrial Conference Statements 10 days before the Conference;

NOW, THEREFORE, the Parties stipulate and agree that the pending Preliminary Pretrial Conference currently set for September 8, 2008, be continued for a period of 60-90 days, or such other date as may be acceptable to the Court.

IT IS SO STIPULATED by the parties hereto:

Dated: July 16, 2008

J. Andrew Coombs, A Professional Corp.

By: /s/ J. Andrew Coombs J. Andrew Coombs Annie S. Wang Attorneys for Plaintiff Louis Vuitton Malletier, S.A. Gauntlett & Associates

Dated: July 16, 2008

By: /s/ James A. Lowe James A. Lowe Brian S. Edwards Attorneys for Defendants Akanoc Solutions, Inc., Managed Solutions Group, Inc. and Steven Chen

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