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26 Specially Appearing for Defendants  
27 ROBINSON & WOOD, INC. and ARCHIE S. ROBINSON

28 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

20 FOXCONN ELECTRONICS, INC., a  
21 California corporation, and HON HAI  
22 PRECISION INDUSTRY CO., LTD., a  
23 Taiwanese corporation,

Plaintiffs,

vs.

24 ROBINSON & WOOD, INC., a California  
25 corporation, ARCHIE S. ROBINSON, an  
26 individual, and DOES 1-100, inclusive,

Defendants.

Case No. C07-05710 RS

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT;  
STAY OF DISCOVERY; AND  
RESCHEDULING OF CASE  
MANAGEMENT CONFERENCE AND  
ADR DEADLINES; ORDER THEREON**

Action Filed: November 9, 2007

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STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT; STAY OF DISCOVERY; AND RESCHEDULING OF  
CASE MANAGEMENT CONFERENCE AND ADR DEADLINES; ORDER THEREON - CASE NO. C07-05710 RS

1 Pursuant to Northern District Local Rule 6-1(a), Plaintiffs Foxconn Electronics,  
2 Inc. and Hon Hai Precision Industry Co., Ltd. ("Plaintiffs") and Defendants Robinson & Wood,  
3 Inc. and Archie Robinson ("Defendants"), by and through their respective counsel, hereby  
4 stipulate as follows:

5 WHEREAS, on November 9, 2007, Plaintiffs filed with the Court their Complaint,  
6 alleging professional negligence, breach of contract, and breach of fiduciary duty;

7 WHEREAS, on November 9, 2007, the Court issued an Order Setting Initial Case  
8 Management Conference and ADR Deadlines (the "Order");

9 WHEREAS, the Order provides that the parties have until February 6, 2008 to  
10 meet and confer regarding, among other things, initial disclosures and discovery;

11 WHEREAS, pursuant to the Order, the Court has scheduled an Initial Case  
12 Management Conference on February 27, 2008;

13 WHEREAS, the parties agreed to pursue alternative dispute resolution and attend a  
14 second session of mediation with Judge Edward Infante on January 18, 2008;

15 WHEREAS, persons with full settlement authority were scheduled to attend the  
16 mediation session scheduled for January 18, 2008;

17 WHEREAS, Judge Infante cancelled the January 18, 2008 mediation;

18 WHEREAS, to facilitate resolution of the parties' dispute, Defendants and  
19 Plaintiffs entered into a stipulation by which they agreed to extend the time for Defendants to file  
20 a responsive pleading in this matter to February 6, 2008 and stay: (i) discovery, (ii) the  
21 production of Rule 26 initial disclosures, and (iii) other Court-required procedures;

22 WHEREAS, the parties agreed that the filing of the stipulation did not constitute a  
23 general appearance by Defendants, and that Defendants did not waive their right to assert any  
24 defense to this action, including, but not limited to, lack of jurisdiction or that Plaintiffs'  
25 Complaint is barred by the applicable statute of limitations;

26 WHEREAS, the parties further agreed that the filing of the stipulation did not  
27 constitute an acknowledgement by Plaintiffs of the merits of any defenses that may be asserted by

1 Defendants or an agreement that any such defenses have not been previously waived;

2 WHEREAS, the Parties' stipulation was filed on or about November 30, 2007;

3 WHEREAS, the Parties have rescheduled the mediation with Judge Infante for  
4 March 12, 2008;

5 WHEREAS, persons with full settlement authority are scheduled to attend the  
6 March 12, 2008 mediation session with Judge Infante;

7 WHEREAS, to facilitate resolution of the parties' dispute, Defendants seek a  
8 further extension of the time in which to respond to Plaintiffs' Complaint and the parties seek a  
9 stay of: (i) discovery, (ii) the production of Rule 26 initial disclosures, and (iii) other Court-  
10 required procedures;

11 WHEREAS, the parties agree that the filing of this stipulation does not constitute a  
12 general appearance by Defendants, and that Defendants do not waive their right to assert any  
13 defense to this action, including, but not limited to lack of jurisdiction or that Plaintiffs'  
14 Complaint is barred by the applicable statute of limitations;

15 WHEREAS, the parties agree that the filing of this stipulation does not constitute  
16 an acknowledgment by Plaintiffs of the merits of any defenses that may be asserted by  
17 Defendants or an agreement that any such defenses have not been previously waived;

18 WHEREAS, in order to facilitate resolution of the parties' dispute they seek to  
19 change the date by which a meeting of counsel must occur regarding the initial disclosures and  
20 discovery (February 6, 2008), the date for filing Rule 26 reports (February 22, 2008), and the date  
21 of the Initial Case Management Conference (February 27, 2008);

22 THEREFORE, pursuant to the parties' agreement, Defendants shall have until  
23 April 2, 2008 to respond to Plaintiffs' Complaint. Moreover, the parties are not required to  
24 engage in discovery, to produce Rule 26 initial disclosures, or participate in other Court-required  
25 procedures from the date of this Stipulation and continuing until March 12, 2008. The parties  
26 further agree to the following new Initial Case Management schedule: April 2, 2008 – Last day  
27 to (a) meet and confer re: initial disclosures, early settlement, ADR process selection, and

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discovery plan; and, (b) file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference; April 16, 2008 – Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement; and, April 23, 2008 – Initial Case Management Conference, in Courtroom 4, Fifth Floor, San Jose, California, at 2:30 p.m.

Dated: February 04, 2008.

PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: Eve M. Coddon / DP  
EVE M. CODDON  
Attorneys for Plaintiffs  
FOXCÖNN ELECTRONICS, INC., and  
HON HAI PRECISION INDUSTRY CO.,  
LTD.

Dated: February 5, 2008.

LONG & LEVIT LLP

By: [Signature]  
JESSICA R. MACGREGOR  
Specially Appearing for Defendants  
ROBINSON & WOOD, INC., AND  
ARCHIE S. ROBINSON

Based on the parties' stipulation and good cause appearing therefore, IT IS SO ORDERED.

Dated: 2/5, 2008.

[Signature]  
Hon. Richard Seeborg