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Counsel for S3 Partners, LLC; The Shields  
 Foundation; Northwest Consulting  
 Group, LLC; Livingstone Capital;  
 Stagecoach Retail, LLC; Sonterra Retail  
 Center, LLC; and Melvin Russell Shields

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

**MARK SHEPHERD AND DELIA SHEPHERD**

PLAINTIFFS,

v.

**S3 PARTNERS, LLC, ALARIS  
 DEVELOPMENT; THE SHIELDS  
 FOUNDATION; NORTHWEST CONSULTING  
 GROUP, LLC; CORINTHIAN WEALTH  
 MANAGEMENT; GOLDEN CREST WEALTH  
 MANAGEMENT; PIERCE ARROW INVESTORS,  
 LLC; LIVINGSTONE CAPITAL; STAGECOACH  
 RETAIL, LLC; SONTERRA RETAIL CENTER,  
 LLC; MICHAEL SIMS; SAM STAFFORD;  
 MELVIN RUSSELL SHIELDS; DAVID  
 VAUGHN; DAVID SAMUELS; CHASTAN  
 SHIELDS; AND DOUG BURKE,**

Defendants.

Case No. 09-CV-01405 RMW

**\*AMENDED\***

**STIPULATION TO EXTEND DEADLINE TO  
 COMPLETE DISCOVERY AND ALTERNATIVE  
 DISPUTE RESOLUTION AND ORDER**

No Hearing

**STIPULATION**

1. On October 26, 2010, an order issued appointing Paul A. Renne, Esq. as mediator in this.

2. The parties have not conducted depositions in this matter.

3. S3 Partners, LLC; The Shields; Foundation; Northwest Consulting

Group, LLC; Livingstone Capital; Stagecoach Retail, LLC; Sonterra Retail Center, LLC; Melvin Russell Shields; and Chastan Shields (the "Shields Defendants") desire to take the deposition of the plaintiffs before a mediation of the dispute.

4. Mark and Delia Sheppard previously noticed for March 22, 2011 and desire to take the deposition of Melvin Russell Shields before a mediation of the dispute. Mr. Shields lives in North Carolina and was not available to travel to California for the date that his deposition was noticed. His deposition was rescheduled by consent of counsel for April 13, 2011.

5. The current discovery cutoff for percipient witnesses on April 29, 2011 and the Trial Date is August 29, 2011; Pretrial Conference is August 11, 2011.

6. The parties desire to extend the time to complete the mediation until June 1, 2011.

7. The Parties desire to extend the completion of discovery until May 28, 2011.

8. The Parties desire to extend the deadline to file dispositive motions to June 1, 2011 and last date to hear dispositive motions is July 8, 2011.

So Stipulated.

Dated: April 7, 2011

**CAMPEAU GOODSSELL SMITH**  
A Law Corporation

By: /s/ Gregory J. Charles  
Gregory J. Charles  
Attorneys for S3 Partners, LLC; The  
Shields Foundation; Northwest  
Consulting Group, LLC; Livingstone  
Capital; Stagecoach Retail, LLC;  
Sonterra Retail Center, LLC; Melvin  
Russell Shields; and Chastan Shields

Dated: April 7, 2011

**RICE & BRONITSKY**

By: s/ Paul E. Rice  
Paul E. Rice

Attorneys for Plaintiffs  
Mark Shepherd and Delia Shepherd

So Ordered.

Dated: April 15, 2011



Ronald M. Whyte  
United States District Court Judge