

E-Filed 3/7/11

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5 Attorneys for Plaintiff MSGI
 6 Security Solutions, Inc.

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9

10 MSGI SECURITY SOLUTIONS, INC., a New
 York Corporation,

Case No. C09-03330-RS

11 Plaintiff;

**STIPULATION TO EXTEND TIME TO
 COMPLETE EARLY NEUTRAL
 EVALUATION AND [PROPOSED]
 ORDER**

12 v.

13 HYUNDAI SYSCOMM CORPORATION, et al.,

14 Defendants.
 15

16 AND RELATED COUNTERCLAIM

17
 18 TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:

19 This Stipulation is made pursuant to ADR L.R. 5-5 and is made between Plaintiff MSGI
 20 Security Solutions, Inc. (hereinafter "MSGI") and Defendants Hyundai Syscomm Corporation,
 21 Hyundai Syscomm Inc., Apro Media Corporation, Hirsch Group LLLP, Hirsch Capital Corporation,
 22 Hyundai RFMON Corporation, Samuel Lee, Jack Choe, Benjamin Byun, Wallace Benjamin Garst,
 23 Jr., and David Choe (collectively known as "Defendants"), by and through their respective counsel.

24 The parties herein agree and stipulate as follows:

- 25 1. On or about July 21, 2009, this action was filed with the Northern District of
 26 California, San Jose Division;
- 27 2. On or about January 19, 2010, Plaintiff and Defendants participated in an ADR phone
 28 conference and agreed to participate in an early neutral evaluation ("ENE");

1 3. On or about July 22, 2010, the Court held a Case Management Conference setting the
2 case for ENE to be completed within 90 days, or October 20, 2010;

3 4. On or about September 7, 2010, Plaintiff's counsel moved to withdraw as attorney for
4 Plaintiff and a hearing was set for October 14, 2010;

5 5. On or about September 14, 2010, Walter J. Robinson was assigned by the Court as the
6 Early Neutral Evaluator;

7 6. On September 24, 2010, this court entered its Order extending the ENE deadline from
8 October 20, 2010 to December 6, 2010;

9 7. On October 6, 2010, this court entered its Order granting leave of Plaintiff's counsel to
10 withdraw;

11 8. On February 15, 2011, William J. Goines of Greenberg Traurig, LLP entered an
12 appearance as counsel for Plaintiff;

13 9. On February 24, 2011, counsel for the parties met and conferred about the merits of
14 the case, scheduling, and related procedural issues;

15 10. On March 4, 2011, counsel for the parties conducted a conference call with the
16 assigned Early Neutral Evaluator, Walter J. Robinson, resulting in an agreed ENE date of April 26,
17 2011, with briefing schedules also duly established.

18 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action,
19 through their respective counsel, that the deadline to complete ENE shall be extended from December
20 6, 2010 to April 29, 2011.

21
22 Dated: March 7, 2011.

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ William J. Goines
William J. Goines
Attorney for Plaintiff and Counter Defendant
MSGI Security Solutions, Inc.

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3 Dated: March 7, 2011.

LAW OFFICES OF DENNIS D. BROWN

4 By: /s/ Dennis D. Brown

5 Dennis D. Brown
6 Attorney for Defendants
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8 ATTESTATION CLAUSE

9 I, William J. Goines, am the ECF User whose ID and password are being used to file this
10 STIPULATION TO EXTEND TIME TO COMPLETE EARLY NEUTRAL EVALUATION AND
11 [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that Dennis D.
12 Brown has concurred in this filing.
13

14 Date: March 7, 2011.

GREENBERG TRAUER LLP

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17 By: /s/ William J. Goines

18 William J. Goines
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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated: 3/7/11 _____.



Hon. Richard Seeborg
Judge, United States District Court

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