

1 WILLIAM J. GOINES (SBN: 61290)
 ALICE Y. CHU (SBN: 264990)
 2 GREENBERG TRAUIG, LLP
 1900 University Avenue, Fifth Floor
 3 East Palo Alto, California 94303
 Telephone: (650) 328-8500
 4 Facsimile: (650) 328-8508
 Email: goinesw@gtlaw.; chua@gtlaw.com

5 Attorneys for Plaintiff MSGI
 6 Security Solutions, Inc.

7 DENNIS DEAN BROWN
 LAW OFFICES OF DENNIS D. BROWN
 8 111 N. Market Street, Ste. 1010
 San Jose, Ca 95113-1112
 9 Telephone: (408) 277-0727
 Email: Ddb-law@pacbell.net

10 Attorney for Defendants Hyundai Syscomm Corporation,
 11 Hyundai Syscomm Inc., Apro Media Corporation, Hirsch Group
 LLLP, Hirsch Capital Corporation, Hyundai RFMON
 12 Corporation, Samuel Lee, Jack Choe, Benjamin Byun, Wallace
 Benjamin Garst, Jr., and David Choe

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

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

18 Plaintiff;

19 v.

20 HYUNDAI SYSCOMM CORPORATION, et al.,

21 Defendants.

Case No. C09-03330-RS

**STIPULATION TO EXTEND
 DISCOVERY CUT-OFF DATES AND
 [PROPOSED] ORDER**

22 AND RELATED COUNTERCLAIM
 23

24
 25 TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:

26 This Stipulation is pursuant to Civil L.R. 6-2 and is made between Plaintiff MSGI Security
 27 Solutions, Inc. (hereinafter "Plaintiff" or "MSGI") and Defendants Hyundai Syscomm Corporation,
 28 Hyundai Syscomm Inc., Apro Media Corporation, Hirsch Group LLLP, Hirsch Capital Corporation,

1 Hyundai RFMON Corporation, Samuel Lee, Jack Choe, Benjamin Byun, Wallace Benjamin Garst,
2 Jr., and David Choe (collectively known as “Defendants”), by and through their respective counsel.

3 The parties herein agree and stipulate as follows:

4 1. On or about July 21, 2009, this action was filed with the Northern District of
5 California, San Jose Division;

6 2. On February 15, 2011, William J. Goines of Greenberg Traurig, LLP entered an
7 appearance as counsel for Plaintiff;

8 3. Pursuant to the Case Management Scheduling Order filed March 17, 2011 [ECF Doc.
9 #123](“March 17, 2011 Order”), the Court established the following discovery deadlines, with a trial
10 date set for July 23, 2012:

11 (a) Completion of non-expert discovery: October 30, 2011;

12 (b) Plaintiff’s disclosure of expert testimony and reports: November 30, 2011;

13 (c) Defendants’ disclosure of expert testimony and reports: December 30, 2011;

14 (d) Parties’ disclosure of rebuttal expert disclosures and exchange of reports: January 30,
15 2012;

16 (e) Completion of expert witness discovery: March 15, 2012.

17 4. The parties participated in a mediation with Walter J. Robinson on June 30, 2011 and
18 have maintained a continuous dialogue since that time to see if a mutually acceptable settlement of
19 Plaintiff’s claims may be achieved;

20 5. In light of their ongoing settlement discussions, the Parties believe that a 45-day
21 extension of the discovery deadlines in the March 17, 2011 Order will significantly aid their
22 settlement efforts such that the Parties may engage in additional settlement discussions and allocate
23 their time and resources to such discussions;

24 6. This is the first request for extension of the dates set forth in the March 17, 2011
25 Order;

26 7. The requested extensions will not affect other dates set forth in the March 17, 2011
27 Order;

28

1 8. Mediator Walter J. Robinson is continuing to work with the Parties and recommends
2 extending the discovery deadlines to aid settlement efforts.

3 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action,
4 through their respective counsel, that the Court may enter an order extending by forty-five (45) days
5 the current discovery deadlines as follows:

6 (a) Completion of non-expert discovery:

7 Old Date: October 30, 2011

8 New Date: December 14, 2011

9 (b) Plaintiff's disclosure of expert testimony and reports:

10 Old Date: November 30, 2011

11 New Date: January 13, 2012

12 (c) Defendants' disclosure of expert testimony and reports:

13 Old Date: December 30, 2011

14 New Date: February 13, 2012

15 (d) Parties' disclosure of rebuttal expert disclosures and exchange of reports:

16 Old Date: January 30, 2012

17 New Date: March 15, 2012

18 (e) Completion of expert witness discovery:

19 Old Date: March 15, 2012

20 New Date: April 30, 2012

21
22 Dated: October 18, 2011.

Respectfully submitted,

23 GREENBERG TRAUIG, LLP

24 By: /s/ William J. Goines

25 William J. Goines
26 Attorney for Plaintiff and Counter Defendant
27 MSGI Security Solutions, Inc.
28

1 Dated: October 18, 2011.

LAW OFFICES OF DENNIS D. BROWN

2 By: /s/ Dennis D. Brown

3 Dennis D. Brown
4 Attorney for Defendants

5 ATTESTATION CLAUSE

6 I, William J. Goines, am the ECF User whose ID and password are being used to file this
7 STIPULATION TO EXTEND DISCOVERY CUT-OFF DATES AND [PROPOSED] ORDER. In
8 compliance with General Order 45, X.B., I hereby attest that Dennis D. Brown has concurred in this
9 filing.

10 Date: October 18, 2011.

GREENBERG TRAUIG LLP

11 By: /s/ William J. Goines

12
13
14
15
16
17 ~~PROPOSED~~ ORDER

18
19 GOOD CAUSE APPEARING, IT IS SO ORDERED.

20 Dated: 10/18/11.

21
22 

23 Hon. Richard Seeborg
24 Judge, United States District Court