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Attorneys for Defendant American Multi-Cinema, Inc.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

11 ALMA CLARISA HERNANDEZ, et al.,

CASE NO.: CV10-02848-PVT

12 Plaintiffs,

**STIPULATION AND ~~PROPOSED~~
ORDER TO VACATE NOTICE OF
DEFAULT**

13 v.

14 VALLCO INTERNATIONAL
15 SHOPPING CENTER, LLC, et al.,

Complaint Filed: June 29, 2010
Trial Date: None Set

16 Defendants.

17 Plaintiffs and Defendant American Multi-Cinema, Inc. stipulate as follows:

18 1. On August 11, 2010, Defendant American Multi-Cinema, Inc. filed its
19 answer to Plaintiff’s First Amended Complaint.

20 2. On August 10, 2010, the Court’s clerk entered a notice of default as to
21 Defendant American Multi-Cinema, Inc.

22 3. Counsel for Plaintiffs and Defendant American Multi-Cinema, Inc. have
23 conferred and agreed to stipulate that, under the circumstances presented here, good
24 cause exists to vacate the notice of default.

25 4. Because the parties would like to minimize fees and expenses in the
26 Action, and focus efforts on advancing the case rather than engage in motion practice
27 on this issue, Plaintiffs and Defendant American Multi-Cinema, Inc. therefore
28 stipulate that the notice of default is vacated as of this day.

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Dated: August 11, 2010
MOORE LAW FIRM, P.C.

By: /s/ Tanya Moore
Tanya Moore

Attorneys for Plaintiffs Alma Clarisa
Hernandez, Theresa Wallen, and
Ronald Moore

Dated: August 11, 2010
HUNTON & WILLIAMS LLP

By: /s/ M. Brett Burns
M. Brett Burns

Attorneys for Defendant American Multi-
Cinema, Inc.

GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated: August _12_, 2010


HON. PATRICIA V. TRUMBULL