

1 MELANIE M. NORVELL, ESQ.
 Admitted *Pro Hac Vice*
 2 BOVIS, KYLE & BURCH, LLC
 200 Ashford Center North, Suite 500
 3 Atlanta, GA 30328
 Telephone: 770-391-9100

4 STEVE W. DOLLAR, ESQ. (SBN 104365)
 5 ERICKSEN ARBUTHNOT
 152 North Third Street, Suite 700
 6 San Jose, CA 95112
 Telephone: 408- 286-0880
 7 Facsimile: 408-286-0337
 E-mail: nritz@eakdl.com

8 Attorneys for Defendants
 9 SAM HOLDINGS, LLC, HANDSON VENTURES,
 LLC, RUSTIC CANYON, LLC and HOV GLOBAL
 10 SERVICES LTD.

11 ROBERT S. NELSON (SBN 220984)
 12 DANIELLE L. TIZOL (SBN 259702)
 NELSON LAW GROUP
 13 900 Cherry Avenue, Suite 300
 San Bruno, CA 94066
 14 (650) 794-2760 (phone)
 (650) 794-2761 (fax)
 15 rmelson@nelsonlawgroup.net

16 H. CLYDE LONG (SBN 102148)
 LONG LAW OFFICES
 17 950 Risa Road, 2nd Floor
 Lafayette, CA 94549
 18 (925) 284-5575 (phone)
 (925) 284-5659 (fax)
 19 clyde@longlawoffices.com

20 Attorneys for Plaintiffs
 EDDIE KING, DEBBIE KING, BILLY RAY
 21 PITCHER, and JOHN W. MALONEY

22
 23 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

24 EDDIE KING, an individual; DEBBIE
 25 KING, an individual; BILLY RAY
 PITCHER, an individual; and JOHN W.
 26 MALONEY, an individual,
 27 Plaintiff,

Case No. 5:10-cv-04706 EJD HRL

JOINT STIPULATION AND ~~PROPOSED~~ ORDER
 GRANTING REQUEST OF COUNSEL FOR
 PLAINTIFFS AND DEFENDANTS TO EXTEND
 THE DEADLINES TO COMPLETE FACT
 DISCOVERY AND FILE/SERVE DISPOSITIVE
 MOTIONS FOR SIXTY DAYS.

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v.

SAM HOLDINGS, LLC, a limited liability company; HANDSON VENTURES, LLC, a limited liability company; RUSTIC CANYON LLC and HOV GLOBAL SERVICES LTD,

Defendants.

SAM HOLDINGS, LLC, a limited liability company,

Counter-Claimant,

v.

EDDIE KING, an individual; DEBBIE KING, an individual; BILLY RAY PITCHER, an individual; and JOHN W. MALONEY, an individual,

Counter-Defendants.

Judge: District Judge Edward J. Davila

**Fact Discovery Deadline:
October 19, 2011**

**Deadline to File/Serve Dispositive Motions:
October 31, 2011**

TO ALL PARTIES AND COUNSEL OR RECORD:

IT IS HEREBY STIPULATED by and between Plaintiffs, EDDIE KING, DEBBIE KING, BILLY RAY PITCHER and JOHN W. MALONEY (“Plaintiffs”), by and through their undersigned counsel, and Defendants, SAM HOLDINGS, LLC, HANDSON VENTURES, LLC, RUSTIC CANYON, LLC, and HOV GLOBAL SERVICES LTD (“Defendants”), by and through their undersigned counsel, that the existing deadlines to complete fact discovery and to file/serve dispositive motions be extended by sixty (60) days for the purpose of allowing each party to take additional depositions as follows:

1. The Court previously entered its *Stipulation And Order To Modify Case Management Scheduling Order* on August 10, 2011 modifying certain deadlines, including the deadlines to complete fact discovery and file/serve dispositive motions. [Docket No. 29]. The existing deadline to complete fact discovery is October 19, 2011, and the deadline to file/serve dispositive motions is October 31, 2011.

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Attorneys for Plaintiffs EDDIE KING,
DEBBIE KING, BILLY RAY
PITCHER, and JOHN W. MALONEY

Dated: September 30, 2011

ERICKSEN ARBUTHNOT

By: /s/ Steve W. Dollar
STEVE W. DOLLAR

Dated: September 30, 2011

BOVIS, KYLE & BURCH, LLC

By: /s/ Melanie M. Norvell
MELANIE M. NORVELL
(*Appearing Pro Hac Vice*)

Attorneys for Defendants SAM
HOLDINGS, LLC, HANDSON
VENTURES, LLC, RUSTIC CANYON,
LLC and HOV GLOBAL SERVICES
LTD.

ORDER OF THE COURT

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 6, 2011



JUDGE, UNITED STATES DISTRICT COURT