Akanoc Solutions, Inc., Managed

Solutions Group, Inc., Steven Chen

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Louis Vuitton v. Akanoc, et al.: Stipulation re Discovery Cut-off

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

Louis Vuitton Malletier, S.A.,	) Case No.: C 07 3952 JW
Plaintiff, v.	)  JOINT STIPULATION AND  [PROPOSED] ORDER GRANTING  LIMITED ENLARGEMENT OF THE  DISCOVERY CUT-OFF DATE
Akanoc Solutions, Inc., et al.,	) DISCOVERT CUT-OFF DATE
Defendants.	) ) )

Plaintiff Louis Vuitton Malletier, S.A. ("Plaintiff") and Defendants Akanoc Solutions, Inc., Managed Solutions Group, Inc. and Steven Chen (collectively "Defendants") by and through their respective counsel of record agree and stipulate as follow:

- 1 -

1	WHEREAS the Court has entered a Scheduling Order in the above-captioned matter		
2	setting, among other things, a discovery cut-off date of April 28, 2008; and		
3	WHEREAS the Plaintiff served notices of depositions setting the depositions of two		
4	employees of Defendant Akanoc Solutions, Inc., on April 23, 2008, in Pleasanton within the		
5	Northern District of California within the discovery cut-off; and		
6	WHEREAS Magistrate Judge Lloyd entered an order compelling the appearance of		
7	Plaintiff's designee to testify on issues as provided by Fed.R.Civ.P. 30(b)(6) and the best mutually		
8	acceptable date on which to conduct that deposition is April 23, 2008; and		
9	WHEREAS a motion to compel production is on calendar before Magistrate Judge Lloyd		
10	for April 29, 2008;		
11	NOW, THEREFORE, Plaintiff and Defendants stipulate and agree that the Discovery Cut-		
12	off may, subject to order of this Court, be enlarged to April 29, 2008 for the limited purpose of		
13	taking the depositions of the two employees of defendant Akanoc Solutions, Inc. previously		
14	noticed by Plaintiff.		
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16	Dated: April 22, 2008 J.	Andrew Coombs, A Professional Corp.	
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18		y:/s/ J. Andrew Coombs J. Andrew Coombs	
19	A	Annie S. Wang ttorneys for Plaintiff Louis Vuitton Malletier, S.A.	
20	Dated: April 23, 2008	AUNTLETT & ASSOCIATES	
21			
22	В	y: <u>/s/ James A. Lowe</u>	
23		James A. Lowe Brian S. Edwards	
24		ttorneys for Defendants Akanoc Solutions, Inc., Ianaged Solutions Group, Inc., Steven Chen	
25			
26	IT IS SO ORDERED . All other dates set in the November 13, 2007 scheduling order remain unchanged. Last date dispositive motions set for June 30, 2008. Preliminary Premal and Trial Setting Conference set for September 8, 2008 at 11:00 AM.		
27 28	Dated: April 24, 2008	Hon. James Ware District Judge, Northern District of California	

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## **PROOF OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 E. Wilson Ave., Suite 202, Glendale, California 91206.

On April 23, 2008, I served on the interested parties in this action with the:

## JOINT STIPULATION AND [PROPOSED] ORDER GRANTING LIMITED ENLARGEMENT OF THE DISCOVERY CUT-OFF DATE

for the following civil action:

Louis Vuitton Malletier S.A. v. Akanoc Solutions, Inc., et al.

by placing a true copy thereof in an envelope to be immediately sealed thereafter. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

James A. Lowe Brian S. Edwards Gauntlett & Associates 18400 Von Karman Ave., Suite 300 Irvine, California 92612

Place of Mailing: Glendale, California Executed on April 23, 2008, at Glendale, California.

Katrina Bartolome