

1 Sayuri K. Sharper (Bar No. 232331)
 ssharper@sharperlaw.com
 2 PRO BONO PROJECT SILICON VALLEY
 480 N. First Street
 3 San Jose, CA 95112
 Telephone: (408) 998-5298
 4 Facsimile: (408) 971-9672

5 Attorney for Defendant Ngoc Ha T. Nguyen

6 Thomas P. Riley (Bar No. 194706)
 TPRLAW@att.net
 7 LAW OFFICES OF THOMAS P. RILEY, P.C.
 First Library Square
 8 1114 Fremont Avenue
 South Pasadena, CA 91030
 9 Telephone: (626)799-9797
 Facsimile: (626)799-9795

10 Attorneys for Plaintiff Joe Hand Promotions, Inc.

12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **San Jose Division**

16 JOE HAND PROMOTIONS, INC.,
 17 Plaintiff,
 18 v.
 19 NGOC HA T. NGUYEN, et al.,
 20 Defendant.

Case No. 11-CV-0506-LHK

**STIPULATION AND REQUEST FOR
 ORDER CHANGING TIME FOR
 EXISTING CASE SCHEDULE**

AS MODIFIED

22 Defendant Ngoc Ha T. Nguyen (“Defendant”) and Plaintiff Joe Hand Promotions, Inc.
 23 (“Plaintiff”) respectfully submit this stipulated Request for Order Changing Time for Existing
 24 Case Schedule.

25 1. On October 13, 2011, this Court referred Defendant to the Federal Pro Bono
 26 Project and appointed Sayuri K. Sharper as Counsel for Defendant. The appointment stayed the
 27 case for four weeks.

28

1 2. In the Case Management Order issued on October 12, 2011 (Docket Item No. 31),
2 this Court gave the parties an additional 90 days to complete the ordered settlement conference,
3 reset the deadline to amend the pleadings to November 10, 2011, and encouraged the parties to
4 meet and confer to make any further modifications to the existing schedule and file a joint
5 proposed case schedule if necessary.

6 3. The parties have scheduled a settlement conference with Magistrate Judge Grewal
7 for January 6, 2012.

8 4. The parties have further agreed to the following proposed changes to the existing
9 schedule:

10 Fact Discovery Cutoff: February 10, 2012

11 Last Day to File Expert Witness Designations: February 17, 2012

12 Expert Discovery Cutoff: March 9, 2012

13 Last Day to File Dispositive Motions: March 16, 2012

14 Pretrial Conference Date: To be determined by the Court

15 Court Trial Date: To be determined by the Court

16 5. The enlargement of time is necessary and reasonable to give the parties enough
17 time to complete fact and expert discoveries if the parties are unable to settle on or prior to January
18 6, 2012, when the settlement conference is scheduled to be completed.

19 6. In its first Case Management Order (Docket Item No. 17), the Court ordered the
20 parties to complete a settlement conference by October 26, 2011. In a subsequent Case
21 Management Order, the Court gave the parties an additional 90 days to comply with the order.
22 The Court and the parties have not made any other modifications to the existing schedule.

23 7. The requested changes will delay the trial date, which is currently set for March 30,
24 2012.

25 8. The parties respectfully request that this Court change the existing case schedule in
26 accordance with the proposal above.

27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DATED: November 17, 2011

PRO BONO PROJECT SILICON VALLEY

By: _____ /s/
Sayuri K. Sharper
Attorney for Defendant

DATED: November 17, 2011

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: _____ /s/
Thomas P. Riley
Attorney for Plaintiff

ORDER

Pursuant to the above stated stipulation by the parties, the existing schedule is modified as follows:

- Fact Discovery Cutoff: February 10, 2012
- Last Day to File Expert Witness Designations: February 17, 2012
- Expert Discovery Cutoff: March 9, 2012
- Last Day to File Dispositive Motions: March 15, 2012
- Last Day to Hear Dispositive Motions: April 19, 2012, at 1:30 p.m.
- Pretrial Conference Date: May 30, 2012, at 2:00 p.m.
- Court Trial Date: June 18, 2012, at 9:00 a.m.

November 17, 2011

Lucy H. Koh

