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6 Attorneys for Plaintiff and Counter-Claim Defendant  
 7 MARBLE BRIDGE FUNDING GROUP, INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

12 MARBLE BRIDGE FUNDING GROUP,  
 13 INC.,

14 Plaintiff,

15 vs.

16 NATURE'S OWN PHARMACY, LLC, et  
 17 al.,

18 Defendants.

19 MARBLE BRIDGE FUNDING GROUP,  
 20 INC.,

21 Plaintiff,

22 vs.

23 EULER HERMES AMERICAN CREDIT  
 INDEMNITY COMPANY,

24 Defendant.

25 EULER HERMES AMERICAN CREDIT  
 26 INDEMNITY COMPANY,

27 Counterclaim Plaintiff,  
 28

Case Nos.: 5:12-CV-01839-EJD; 5:12-CV-02729-EJD

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO RESCHEDULE CASE  
 MANAGEMENT CONFERENCE**

BN 13902513v1

1 vs.

2 NATURE'S OWN PHARMACY, LLC,  
3 RICHARD WALLACE; RICHARD  
4 WALLACE, et al.,

5 Counterclaim Defendants.

6 Plaintiff and Counter-Claim Defendant Marble Bridge Funding Group ("Marble Bridge")  
7 and Defendant and Counter-Claim Plaintiff Euler Hermes American Credit Indemnity Company  
8 (now known as Euler Hermes North America Insurance Company) ("Euler Hermes"), by and  
9 through their respective counsel, hereby stipulate and agree, and request the Court to so order, to  
10 reschedule the Case Management Conference set for May 3, 2013 to June 28, 2013. This is the  
11 first request to extend the CMC and the parties believe it will have no overall effect on the  
12 administration of this case.

13 Good cause exists to reschedule the CMC. On April 5, 2013, Marble Bridge consented to  
14 the substitution of Buchalter Nemer as its counsel. Marble Bridge seeks the continuance to  
15 provide its counsel with a reasonable opportunity to review the files in this action and prepare for  
16 the CMC.

17 Further, counsel for Marble Bridge and Euler Hermes would like additional time to confer  
18 regarding discovery and a joint case management conference statement. The remaining parties  
19 are not expected to appear because of pending criminal charges.

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Dated: April 29, 2013

BUCHALTER NEMER

By:           /s/ Randall L. Manvitz            
Randall L. Manvitz  
Attorney for Plaintiff and Counter-Claim  
Defendant MARBLE BRIDGE FUNDING  
GROUP

Dated: April 29, 2013

HALPERIN BATTAGLIA RAICHT, LLP

By:           /s/ Neal W. Cohen            
Neal W. Cohen  
Attorney for Defendant and Counter-Claim  
Plaintiff EULER HERMES AMERICAN  
CREDIT INDEMNITY COMPANY now  
known as EULER HERMES NORTH  
AMERICA INSURANCE COMPANY

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**ORDER**

PURSUANT TO THE PARTIES' STIPULATION, IT IS ORDERED AS FOLLOWS:

The Case Management Conference is rescheduled from May 3, 2013 to June 28, 2013.  
The parties shall file an updated joint case management conference statement on or  
before June 21, 2013

**IT IS SO ORDERED.**

Dated: April 30, 2013



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Honorable Edward J. Davila  
Judge of the Northern District Court

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CERTIFICATE OF SERVICE

I, Randall L. Manvitz, hereby certify that on this 29<sup>th</sup> day of April 2013, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. A paper copy was sent, via U.S. Mail, to the following individuals:

Richard Wallace  
712 93<sup>rd</sup> Avenue North  
St. Petersburg, FL 33702

0084362 Marsha Holloway  
c/o Marion County Jail  
700 NW 30<sup>th</sup> Avenue  
Ocala, FL 34475

By: /s/ Randall L. Manvitz

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