Jack Russo (Cal. Bar No. 96068)
Christopher Sargent (Cal. Bar No. 246285)
COMPUTERLAW GROUP LLP
401 Florence Street
Palo Alto, CA 94301
650-327-9800
650-618-1863 (fax)
jrusso@computerlaw.com
csargent@computerlaw.com

Attorneys for Plaintiff
RICHARD L. CHANG

LEE TRAN & LIANG LLP
Enoch H. Liang (SBN 212324)
enoch.liang@ltlattorneys.com
Heather F. Auyang (SBN 191776)
heather.auyang@ltlattorneys.com
601 S. Figueroa Street, Suite 3900
Los Angeles, CA 90017
Telephone: (213) 612-8900
Facsimile: (213) 612-3773

Attorneys for Defendant
Biosuccess Biotech, Co., Ltd.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

RICHARD L. CHANG,

Plaintiff,

v.

BIOSUCCESS BIOTECH, CO., LTD., and DOES 1 through 10,

Defendants.

BIOSUCCESS BIOTECH, CO., LTD.,

Counterclaimant,

v.

RICHARD L. CHANG,

Counter-Defendant.

Case No. CV13-01340 JAK (ANx)

STIPULATION TO TAKE HEARING FOR PRELIMINARY INJUNCTION (DKT 70), MOTION TO STRIKE (DKT 69) AND MOTION TO JOIN DR. ZHENG TAO HAN AS A PARTY (DKT 87) OFF-CALENDAR

[PROPOSED ORDER FILED CONCURRENTLY]

Hon: John A. Kronstadt
Date: March 10, 2014
Time: 8:30 a.m.
Place: Courtroom 750

THE PARTIES, BY AND THROUGH THEIR COUNSEL, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, on December 10, 2013, Defendant Biosuccess Biotech Co. Ltd. ("Defendant") moved *ex parte* for a temporary restraining order and order to show cause regarding a preliminary injunction against Plaintiff Richard Chang ("Plaintiff") (Dkt. No. 50);

WHEREAS, on December 12, 2013, Plaintiff filed an opposition to Defendant's motion (Dkt. No. 56) and motion to strike (Dkt. No. 69);

WHEREAS, on December 13, 2013, the Court issued an order denying Defendant's *ex parte* application for a temporary restraining order and granting Defendant's application for the issuance of an order to show cause as to a preliminary injunction, setting the hearing for Defendant's motion for March 10, 2014 at 8:30 am (Dkt. No. 70); and

WHEREAS, on January 13, 2014, Defendant filed a motion to join Dr. Zheng Tao Han as a party with a hearing date for March 10, 2014 at 8:30 am (Dkt. No. 87); and

WHEREAS, on January 27, 2014, Plaintiff filed a Conditional Non-Opposition (Dkt. No. 99);

WHEREAS, the parties have this week been engaged in extensive depositions and based on testimony elicited regarding Plaintiff's activities, Defendant has agreed to take the motion for preliminary injunction off-calendar; and

WHEREAS, the parties agree that Dr. Han should be joined as a party.

THEREFORE, the parties hereby agree and stipulate as follows:

1. The hearing on Defendant's motion for preliminary injunction, currently scheduled for March 10, 2014 at 8:30 am shall be taken off-calendar;

2. The agreement to take the hearing for the preliminary injunction off-calendar is *without prejudice* to Defendant and Defendant may bring the motion for

preliminary injunction at a later date;

3. If Defendant brings a motion for preliminary injunction against Plaintiff or Rich Pharmaceuticals, Inc., Imagic, LLC, Ben Chang, or Richard L. Chang Holdings, LLC on a later date, Defendant's motion(s) shall have a retroactive filing date of December 10, 2013;

4. Plaintiff's motion to strike (Dkt. No. 69) is moot and the hearing currently scheduled for March 10, 2014 at 8:30 am shall be taken off-calendar *without prejudice* to Plaintiff bringing the motion to strike in the future should the same evidence be cited for some other purpose;

5. The parties agree that Dr. Han should be joined as a party and the hearing currently scheduled for March 10, 2014 at 8:30 am shall be taken off-calendar.

Dated: March 7, 2014

COMPUTERLAW GROUP LLP

By: /s/ Chris Sargent
Jack Russo or Chris Sargent
Attorneys for Plaintiff
RICHARD CHANG

Dated: March 7, 2014

LEE TRAN & LIANG LLP

By: /s/ Enoch Liang
Enoch H. Liang
Attorneys for Defendant
BIOSUCCESS BIOTECH, CO., LTD.

ATTESTATION OF E-FILED SIGNATURES

I, Heather F. Auyang, am the ECF user whose ID and password are being used to file this STIPULATION TO TAKE HEARING FOR PRELIMINARY

INJUNCTION (DKT 70), MOTION TO STRIKE (DKT 69) AND MOTION TO JOIN DR. ZHENG TAO HAN AS A PARTY (DKT 87) OFF-CALENDAR. In compliance with Civil L.R. 5-4.3.4, I hereby attest that Chris Sargent has concurred in this filing's content and has authorized this filing.

Dated: March 7, 2014

By: /s/ Heather F. Auyang
Heather F. Auyang