Jack Russo (Cal. Bar No. 96068)
Christopher Sargent (Cal. Bar No. 246285)
ENTREPRENEURLAW 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

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Richard L. Chang,

Plaintiff;

v.

Biosuccess Biotech Co. Ltd., **et al.,**

Defendants.

Biosuccess Biotech, Co. Ltd.,

Counterclaimant,

v.

Richard L. Chang, **et al.,**

Counterclaim Defendants.

Case No. CV13-01340 JAK (ANx)

STIPULATION EXTENDING FILING DEADLINES RE: FINAL PRETRIAL ORDER

Honorable John A. Kronstadt
Courtroom 750

EntrepreneurLaw Group LLP
www.computerlaw.com℠

STIPULATION TO EXTEND DEADLINES FOR FILING OF FINAL PRETRIAL ORDER

This Stipulation is entered into by Plaintiff Richard L. Chang and Defendant Biosuccess Biotech, Co., Ltd. by their respective counsel.

RECITALS

WHEREAS Dkt. 23 requires that a joint exhibit and joint witness list to be filed with the Court no later than 5 court days before the final pretrial conference, which in this case would make the deadline Friday, May 23, 2014;

WHEREAS Docket 23 states that on Thursday, May 22, 2014 Plaintiff should lodge with the Court a Final Pretrial Conference Order before the deadline for an exhibit list;

WHEREAS the Court's form Final Pretrial Conference Order, attached as Appendix A to the Court's Local Rules, includes the following language: "The joint exhibit list of the parties **has been filed** under separate cover as required by L.R. 16-6.1" (emphasis added);

WHEREAS, the parties are unable to comply with both Docket 23 and L.R. 16-6.1;

WHEREAS the parties have been engaged in and are continuing in good faith discussions regarding all pretrial documents;

THEREFORE, to avoid the unnecessary expenditure of the Court's and parties' time, and in the interest of Local Rule 16, the parties stipulate to extend the deadline for lodging the Final Pretrial Conference Order to **Wednesday, May 28, 2014** to allow the parties to comply with Local Rule 16-6.6.

//

//

//

//

//

EntrepreneurLaw Group LLP
www.computerlaw.com℠

IT IS SO STIPULATED:

ENTREPRENEURLAW GROUP LLP

Dated: May 21, 2014

By: /s/ Christopher Sargent
Jack Russo
Christopher Sargent

Attorneys for Plaintiff
RICHARD L. CHANG

Dated: May 21, 2014

LEE TRAN & LIANG LLP

By: /s/ Enoch Liang
Enoch H. Liang

Attorneys for Defendants
BIOSUCCESS BIOTECH, CO., LTD.

ATTESTATION OF E-FILED SIGNATURE

I, Christopher Sargent, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order to Extend Deadlines. In compliance with Civil L.R. 5-4.3.4, I hereby attest that Enoch Liang has agreed with this filing's content and has authorized this filing.

EntrepreneurLaw Group LLP
www.computerlaw.com℠