IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARTIER, a division of RICHEMONT NORTH AMERICA, INC., Plaintiff and Counterclaim Defendant, v. WING HON METAL MANUFACTORY LTD., Defendant and Counterclaim Plaintiff.	**C.A. No. 06-1747 (RMC/JMF)**

CARTIER AND WING HON'S JOINT MOTION
(1) FOR A FOUR-WEEK EXTENSION OF TIME
FOR CARTIER TO FILE ITS DISPOSITIVE MOTION AND
(2) TO POSTPONE THE STATUS CONFERENCE
IN VIEW OF PENDING SETTLEMENT NEGOTIATIONS

Pursuant to Federal Rule of Civil Procedure 16(b), Local Civil Rule 16.4(b), the Scheduling Order, dated May 4, 2007 (D.I. 15), ¶ 1, ¶ 4, ¶ 6, and the Order, dated August 21, 2007 (D.I. 21), plaintiff and counterclaim defendant Cartier, a division of Richemont North America, Inc. ("Cartier") and defendant and counterclaim plaintiff Wing Hon Metal Manufactory Ltd. ("Wing Hon") hereby respectfully jointly move: (1) for a four-week extension of time, until October 26, 2007, for Cartier to file its dispositive motion; and (2) to postpone the status conference currently scheduled for October 5, 2007.

Good cause exists for the requested extension of time and postponement because the parties have reached an agreement in principle to settle this action and are currently in the final stages of negotiating the detailed terms of a settlement agreement. The negotiations continue to take longer than expected because it is difficult for Wing Hon's counsel to communicate with

Wing Hon as it is based in Hong Kong. Although the parties expect to file a joint stipulation of dismissal shortly after entering into a settlement agreement, at this time they do not expect to be in a position to do so on or before the current due date for Cartier's dispositive motion of September 28, 2007. D.I. 21. Therefore, they respectfully jointly request that the Court grant Cartier a four-week extension of time until October 26, 2007, in the expectation that they will file a joint stipulation of dismissal before that time.

Moreover, the parties respectfully jointly request that the Court postpone the status conference currently scheduled for October 5, 2007. D.I. 21. The parties propose that, in the unlikely event that they do not file a joint stipulation of dismissal and that Cartier files a dispositive motion, they will jointly contact the Court to schedule a status conference at a convenient time for the Court.

A proposed form of order is submitted herewith.

Dated: September 26, 2007

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARTIER, a division of RICHEMONT NORTH AMERICA, INC., Plaintiff and Counterclaim Defendant,	)	
v.	)	**C.A. No. 06-1747 (RMC/JMF)**
WING HON METAL MANUFACTORY LTD., Defendant and Counterclaim Plaintiff.	)	

[PROPOSED] ORDER GRANTING CARTIER AND WING HON'S JOINT MOTION (1) FOR A FOUR-WEEK EXTENSION OF TIME FOR CARTIER TO FILE ITS DISPOSITIVE MOTION AND (2) TO POSTPONE THE STATUS CONFERENCE IN VIEW OF PENDING SETTLEMENT NEGOTIATIONS

Plaintiff and counterclaim defendant Cartier, a division of Richemont North America, Inc. ("Cartier") and defendant and counterclaim plaintiff Wing Hon Metal Manufactory Ltd. ("Wing Hon"), having jointly moved: (1) for a four-week extension of time, until October 26, 2007, for Cartier to file its dispositive motion; and (2) to postpone the status conference currently scheduled for October 5, 2007; and for good cause having been shown,

IT IS on this ___ day of September, 2007,

ORDERED that Cartier and Wing Hon's joint motion is GRANTED, that the time within which Cartier may file its dispositive motion is extended to and including October 26, 2007, and that the status conference scheduled for October 5, 2007 is postponed.

_____
Rosemary M. Collyer
United States District Judge

ATTORNEYS TO BE NOTIFIED OF ENTRY OF THE ORDER

Pursuant to Local Civil Rule 7(k), the following is a list of the names and addresses of all attorneys entitled to be notified of the entry of the proposed order:

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