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 FOR A FIVE-WEEK EXTENSION OF TIME FOR CARTIER TO FILE ITS DISPOSITIVE MOTION 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 September 26, 2007 (D.I. 22), 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 for a five-week extension of time, until November 30, 2007, for Cartier to file its dispositive motion.

Good cause exists for the requested extension of time 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 continues to be difficult for Wing Hon's U.S. counsel to communicate with Wing Hon and its counsel as they are 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 October 26, 2007. D.I. 22. Therefore, they respectfully jointly request that the Court grant Cartier a five-week extension of time until November 30, 2007, in the expectation that they will file a joint stipulation of dismissal before that time.

A proposed form of order is submitted herewith.

Dated: October 24, 2007

Respectfully submitted,

By: /s/ John R. Hutchins
John R. Hutchins (D.C. Bar No. 456749)
KENYON & KENYON LLP
1500 K Street, N.W.,
Suite 700
Washington, D.C. 20005
(202) 220-4200
jhutchins@kenyon.com

Of Counsel:
Walter E. Hanley, Jr.
Mark A. Chapman
KENYON & KENYON LLP
One Broadway
New York, NY 10004
(212) 425-7200
whanley@kenyon.com
mchapman@kenyon.com

Counsel for Plaintiff and Counterclaim Defendant Cartier, a division of Richemont North America, Inc.

By: /s/ Theodore R. Remaklus
Michael A. Grow (D.C. Bar No. 225383)
Barbara S. Wahl (D.C. Bar No. 297978)
ARENT FOX LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339
(202) 857-6000
grow.michael@arentfox.com
wahl.barbara@arentfox.com

Theodore R. Remaklus
WOOD HERRON & EVANS LLP
2700 Carew Tower
441 Vine Street
Cincinnati, OH 45202
(513) 241-2324
tremaklus@whepatent.com

Counsel for Defendant and Counterclaim Plaintiff Wing Hon Metal Manufactory Ltd.

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[PROPOSED] ORDER GRANTING CARTIER AND WING HON'S JOINT MOTION FOR A FIVE-WEEK EXTENSION OF TIME FOR CARTIER TO FILE ITS DISPOSITIVE MOTION 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 for a five-week extension of time, until November 30, 2007, for Cartier to file its dispositive motion; and for good cause having been shown,

IT IS on this ___ day of October, 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 November 30, 2007.

_____
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:

Counsel for Plaintiff and Counterclaim Defendant Cartier, a division of Richemont North America, Inc.:

John R. Hutchins (D.C. Bar No. 456749)
KENYON & KENYON LLP
1500 K Street, N.W.,
Suite 700
Washington, D.C. 20005
(202) 220-4200
jhutchins@kenyon.com

Of Counsel:
Walter E. Hanley, Jr.
Mark A. Chapman
KENYON & KENYON LLP
One Broadway
New York, NY 10004
(212) 425-7200
whanley@kenyon.com
mchapman@kenyon.com

Counsel for Defendant and Counterclaim Plaintiff Wing Hon Metal Manufactory Ltd.:

Michael A. Grow (D.C. Bar No. 225383)
Barbara S. Wahl (D.C. Bar No. 297978)
ARENT FOX LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339
(202) 857-6000
grow.michael@arentfox.com
wahl.barbara@arentfox.com

Theodore R. Remaklus
WOOD HERRON & EVANS LLP
2700 Carew Tower
441 Vine Street
Cincinnati, OH 45202
(513) 241-2324
tremaklus@whepatent.com