CHARLES CARREON (CSB # 127139)
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Attorneys for Plaintiffs
Global Innovations, Inc. and Ramsey Lamerson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GLOBAL INNOVATIONS, INC, a Maryland corporation, and RAMSEY LAMERSON, an individual, Plaintiffs, vs. ALS Scan, Inc., a Maryland corporation, WAYNE KIRN, an individual, APIC WORLD-WIDE, INC., a Florida corporation, and STEVE EASTON, an individual, Defendants.	Case No.: C03-1277 JSW STIPULATION RE-NOTICING HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND STAYING PROCEEDINGS IN SEPARATE ACTION; ORDER THEREON DATE: August 1, 2003 TIME: 9:00 a.m. COURTROOM: 2, 17th Floor

STIPULATION

Whereas, the parties herein have all appeared and are represented by counsel, and

plaintiff has filed a Motion for Preliminary Injunction to enjoin defendant ALS Scan, Inc. from

continuing to prosecute an action entitled ALS Scan, Inc. v. Global Innovations, Inc., et. al,

USDC Maryland Case No. 03-cv-1028 (the "Maryland action"), it is hereby stipulated, by and

between plaintiffs Global Innovations, Inc. and Ramsey Lamerson ("plaintiffs") and defendant

ALS Scan, Inc., ("ALS") through their respective counsel of record, as follows:

1. The Motion for Preliminary Injunction ("plaintiff's motion") previously filed by

plaintiffs and noticed for hearing on May 30, 2003, is hereby re-noticed for hearing to

STIPULATION RE-NOTICING HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND STAYING PROCEEDINGS IN
SEPARATE ACTION; ORDER THEREON

August 1, 2003, with opposition and reply briefs to be filed, respectively, 21 and 14 days prior thereto as required by Local Rule 7-3;

2. ALS, plaintiffs, and their attorneys and agents, shall file no papers in the Maryland action or perform any other acts intended to advance the progress of the Maryland action with respect to any party to this stipulation, unless required to do so by the Maryland court;

3. Plaintiffs stipulating hereto acknowledge service of process as defendants in the Maryland action pursuant to the provisions of F.R.C.P. 4(d)(1), waiving no jurisdictional, substantive, or procedural defenses except as to defects in the form or service of the summons;

4. Plaintiffs herein shall have until twenty days after the adjudications noticed for August 1, 2003 to file responsive pleadings in the Maryland action if so required by the results of said adjudications;

5. ALS and Wayne Kirn may file motions in this action attacking the existence of personal jurisdiction and the propriety of venue as to ALS and/or Wayne Kirn in this action, which shall be consolidated for hearing with plaintiff's motion on August 1, 2003;

6. Plaintiffs waive no procedural or substantive defenses or rights of discovery with respect to the motions referred to in paragraph 5 above;

7. Plaintiffs may file a copy of this stipulation and order in the Maryland action in support of a request to extend their time to file a responsive pleading in the Maryland action;

8. Any other defendants in the Maryland action that desire to gain the benefits of this stipulation may do so by acknowledging service of process in the Maryland action on or before May 19, 2003.

Dated: May 9, 2003   ONLINE MEDIA LAW, PLLC

By: _____s/Charles Carreon/s_____
CHARLES CARREON, CSB #127139
Attorney for Plaintiffs

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STIPULATION RE-NOTICING HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND STAYING PROCEEDINGS IN
SEPARATE ACTION; ORDER THEREON

1   Dated: May 9, 2003   IDELL, BERMAN & SEITEL

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3   By: _____s/Owen Seitel/s_____
                                                OWEN SEITEL, CSB # 137365
4   Attorney for Defendants ALS Scan, Inc., Wayne
                                                Kirn, APIC World-wide, and Steve Easton.
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STIPULATION RE-NOTICING HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND STAYING PROCEEDINGS IN
SEPARATE ACTION; ORDER THEREON

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ORDER

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Pursuant to the above stipulation, and good cause appearing therefore, IT IS SO

ORDERED.

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Dated: May ___, 2003

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UNITED STATES DISTRICT COURT JUDGE
Jeffrey S. White

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STIPULATION RE-NOTICING HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND STAYING PROCEEDINGS IN
SEPARATE ACTION; ORDER THEREON