Annie S. Wang (SBN 243027)
annie@wangalc.com
J. Andrew Coombs, Of Counsel (SBN 123881)
andy@wangalc.com
Wang Law Corporation
1150 Foothill Boulevard, Suite E
La Cañada Flintridge, California 91011
Telephone: (818) 500-3200
Facsimile: (818) 500-3201

Attorneys for Plaintiffs
Seiko Epson Corporation
and Epson America, Inc.

Songfong Tommy Wang (SBN 272409)
twang@thewangiplaw.com
Zhen Yang (Tommy) Pan (SBN 314714)
tpan@thewangiplaw.com
Wang IP Law Group, PC
18645 Gale Avenue, Suite 205
City of Industry, California 91748-1345
Telephone: (626) 269-6753
Facsimile: (888) 827-8880

Attorney for Defendant
Khoa Le a/k/a Kenny Le

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Seiko Epson Corporation and Epson America, Inc., Plaintiffs, v. Khoa Le a/k/a Kenny Le; and Does 1-10, inclusive, Defendants.	Case No. 5:20-cv-02433-JWH-SP JOINT STATUS REPORT RE SETTLEMENT AND REQUEST TO CONTINUE HEARING ON MOTION FOR DEFAULT Court: Hon. John W. Holcomb Date: August 6, 2021 Time: 9:00 am

Plaintiffs Seiko Epson Corporation and Epson America, Inc. (collectively "Plaintiffs") and Defendant Khoa Le a/k/a Kenny Le ("Defendant") by and through their respective counsel of record, hereby submit this Joint Status Report re Settlement pursuant to the Court's Order dated July 26, 2021, Docket No. 22:

WHEREAS on or about May 14, 2021, Plaintiffs filed their Notice and Motion for Entry of Default Judgment ("Motion") with an original requested hearing date of July 2, 2021 at 9:00 a.m. Docket No. 16;

WHEREAS the Court continued the hearing on Plaintiffs' Motion twice by stipulation in light of the Parties' ongoing settlement discussions, Docket Nos. 19, 21;

WHEREAS as of the filing of this report, the Parties have not agreed to all terms though they have made considerable progress since Defendant's counsel was retained;

WHEREAS the Parties believe another short continuance of the hearing on Plaintiffs' Motion for Entry of Default Judgment will allow the Parties time to continue and ideally finalize their settlement discussions; and

NOW, THEREFORE, Plaintiffs and the Defendant stipulate and respectfully request that the hearing on Plaintiffs' Motion for Entry of Default Judgment be continued to August 27, 2021, at 9:00 a.m. and all associated briefing dates continued accordingly.

IT IS SO STIPULATED.

Dated: July 29, 2021

Wang Law Corporation

By: /s/ Annie S. Wang
Annie S. Wang
J. Andrew Coombs, Of Counsel
Attorneys for Plaintiffs Seiko Epson Corporation and Epson America, Inc.

Dated: July 29, 2021

Wang IP Law Group, PC

By: /s/ Zhen Yang (Tommy) Pan
Zhen Yang (Tommy) Pan
Attorney for Defendant Khoa Le a/k/a Kenny Le

Pursuant to Local Rule 5-4.3.4, the filer of this Stipulation attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the State of California. My business address is 1150 Foothill Boulevard, Suite E, La Cañada Flintridge, California 91011.

On July 30, 2021, I served the:

JOINT STATUS REPORT RE SETTLEMENT AND REQUEST TO CONTINUE HEARING ON MOTION FOR DEFAULT

[PROPOSED] ORDER GRANTING THIRD STIPULATION TO CONTINUE HEARING ON PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AND ASSOCIATED BRIEFING SCHEDULE

in the following action:

Seiko Epson Corporation, et al. v. Khoa Le, et al.

___ by placing a true copy thereof in an envelope to be immediately sealed thereafter. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at La Cañada Flintridge, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

Songfong Tommy Wang Zhen Yang (Tommy) Pan Wang IP Law Group, PC 18645 Gale Avenue, Suite 205 City of Industry, California 91748-1345

_x_ via email to: *twang@thewangiplaw.com* and *tpan@thewangiplaw.com.*

Place of emailing: La Cañada Flintridge, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on July 30, 2021, at La Cañada Flintridge, California.

Katrina Akim