

FILED/ENDORSED

SEP 28 2015

Bv M. CHAPMAN
DEPUTY CLERK

1 Daniel F. Pyne (State Bar No. 131955)
2 Erika J. Gasaway (State Bar No. 264708)
3 Hopkins & Carley
4 A Law Corporation
5 The Letitia Building
6 70 South First Street
7 San Jose, CA 95113-2406

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9 Post Office Box 1469
10 San Jose, CA 95109-1469
11 Telephone: (408) 286-9800
12 Facsimile: (408) 998-4790

13 Attorneys for Plaintiffs
14 Changming Liu and Aimei Wei

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF SACRAMENTO

17 CHANGMING LIU, an individual, and
18 AIMEI WEI, an individual,
19 Plaintiffs,

CASE NO. 34-2015-00181746-CR-FR-GDS
STIPULATION FOR ENTRY OF
JUDGMENT

20 v.

21 CALIFORNIA LEGAL PRO'S, INC., A
22 California corporation; DEREK
23 BLUFORD, an individual;
24 QUICKLEGAL, INC., A California
25 corporation; BANK OF AMERICA, N.A.,
26 and DOES 1 through 50, inclusive,
27 Defendants.

BY FAX

28 WHEREAS defendant Derek Bluford wishes to avoid the time, expense, uncertainty and
risk of litigation in the above-entitled case;

WHEREAS defendant Bluford is willing to stipulate to the entry of a judgment against
him on certain terms and conditions;

WHEREAS plaintiffs Changming Liu and Aimei Wei are willing to stipulate to the entry
of a judgment against Bluford on the same terms and conditions;

THEREFORE, plaintiffs Changming Liu and Aimei Wei and defendant Derek Bluford
hereby stipulate as follows:

1 1. The Court may enter judgment against defendant Bluford and in favor of plaintiffs
2 Changming Liu and Aimei Wei in the sum of \$559,530.00, in the form attached hereto as Exhibit
3 A;

4 2. The judgement amount of \$559,330.00 shall bear interest at the rate of 5% per
5 annum for the first six months following entry of the judgment and thereafter at a rate of 10% per
6 annum.

7 3. Plaintiffs Changming Liu and Aimei Wei and defendant Derek Bluford shall each
8 bear their own legal fees and costs in connection with the dispute between them, but this
9 stipulation and any judgment entered pursuant to it shall not preclude the plaintiffs from
10 recovering legal fees and/or costs from defendants other than Derek Bluford to the extent
11 permitted by law; and

12 4. Defendant Bluford agrees to entry of judgment as described herein for the sole
13 reason that he wishes to avoid the time, expense, uncertainty and risk of litigation in this case, and
14 defendant Bluford does not admit that any of the allegations set forth in the complaint are true or
15 valid.

16 Dated: September 28, 2015

HOPKINS & CARLEY
A Law Corporation

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19 By: Daniel F. Pyne
20 Daniel F. Pyne
21 Attorneys for Plaintiffs
22 Changming Liu and Aimei Wei

23 Dated: September 25, 2015

CYRUS ZAL, A PROFESSIONAL
CORPORATION

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26 By: [Signature]
27 Cyrus Zal
28 Attorney for Defendant Derek Bluford

EXHIBIT A

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

CHANGMING LIU, an individual, and
AIMEI WEI, an individual,

Plaintiffs,

CASE NO. 34-2015-00181746-CR-FR-GDS

JUDGMENT

v.

CALIFORNIA LEGAL PRO'S, INC., A
California corporation; DEREK
BLUFORD, an individual;
QUICKLEGAL, INC., A California
corporation; BANK OF AMERICA, N.A.,
and DOES 1 through 50, inclusive,

Defendants.

Pursuant to the stipulation of plaintiffs Changming Liu and Aimei Wei and defendant
Derek Bluford, the Court enters judgment in favor of plaintiffs Changming Liu and Aimei Wei
and against defendant Derek Bluford in the sum of \$559,330.00, with interest accruing thereon at
a rate of 5% per annum for the first six months following entry of this judgment and thereafter at
a rate of 10% per annum until the judgment is paid in full. Plaintiffs Changming Liu and Aimei
Wei and defendant Derek Bluford shall each bear their own costs and legal fees in connection
with the dispute between them.

Dated: _____

By: _____
JUDGE OF THE SUPERIOR COURT

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HOPKINS & CARLEY
ATTORNEYS AT LAW
SAN JUAN APOLO ALITO
DUBUQUE

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PROOF OF SERVICE

I, Debi Adams, declare:

I am a citizen of the United States and employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is The Letitia Building, 70 S First Street, San Jose, California 95113-2406. On September 28, 2015, I served a copy of the within document(s):

STIPULATION FOR ENTRY OF JUDGMENT

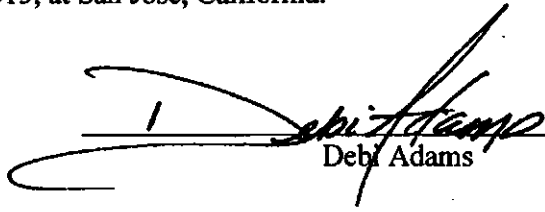
- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Jose, California addressed as set forth below.
- by placing the document(s) listed above in a sealed FEDERAL EXPRESS envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a FEDERAL EXPRESS agent for delivery.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- by electronically mailing a true and correct copy through Hopkins & Carley's electronic mail system to the email address(s) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6(a)(6).

<p><i>Attorneys for Defendants</i> Derek Bluford and QuickLegal, Inc.</p> <p>Cyrus Zal 102 Mainsail Court Folsom, CA 95630</p> <p>Telephone: 916.985.3576 Facsimile: 916.985.4893 Email: czal47@comcast.net</p>	<p><i>Attorneys for Defendants</i> Bank of America, NA</p> <p>Mark Johnson Kenney Austin B. Kenney Eleanor M. Roman SEVERSON & WERSON One Embarcadero Center, Suite 2600 San Francisco, CA 94111</p> <p>Telephone: 415-398-3344 Facsimile: 415-956-0439 Email: mjk@severson.com abk@severson.com mr@severson.com</p>
<p>California Legal Pro's Inc. 980 9th St., 16th Floor Sacramento, CA 95815</p>	

1 I am readily familiar with the firm's practice of collection and processing correspondence
2 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
3 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
4 motion of the party served, service is presumed invalid if postal cancellation date or postage
5 meter date is more than one day after date of deposit for mailing in affidavit.

6 I declare under penalty of perjury under the laws of the State of California that the above
7 is true and correct.

8 Executed on September 28, 2015, at San Jose, California.

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11 Debi Adams

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SUPERIOR COURT
OF CALIFORNIA
SACRAMENTO COUNTY

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COUNTY OF SACRAMENTO

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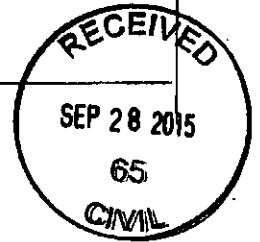
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with the dispute between them.

Dated: _____

By: _____
JUDGE OF THE SUPERIOR COURT

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HOPKINS & CARLEY
ATTORNEYS AT LAW
SAN JOSE PALO ALTO
BURBANK



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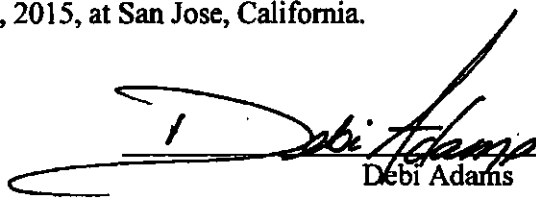
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Executed on September 28, 2015, at San Jose, California.


Debi Adams

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SACRAMENTO COUNTY