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10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **VICTOR HANNAN**, individually and on
 14 behalf of a class of similarly situated
 15 persons,

16 Plaintiff,

17 v.

18 **THE TULVING COMPANY, INC.**, a
 19 California Corporation; and **HANNES**
TULVING, JR. a California resident,

20 Defendants.

Case No. 3:14-cv-01054-JD

JOINT STATUS REPORT

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Pursuant to the Court’s Order Staying Case [D.E. No. 61], the parties hereby submit their first joint status report regarding the stay of the case pending the resolution of the pending criminal investigation of Hannes Tulving, Jr.

Since the Court issued the Order Staying Case, Mr. Tulving has continued his discussions with prosecutors. Importantly, Mr. Tulving is now working with prosecutors on the selection of an expert to value the significant amount of precious metals currently in the possession of the federal government (i.e. in the possession of criminal enforcement authorities and not in possession of the bankruptcy trustee). The disposition of the precious metals in the possession of the government is important to Plaintiff because such precious metals constitute the only potential assets for a class recovery, and for that reason the parties request that the stay be continued, subject to the ongoing reporting requirements as detailed in the Order Staying Case.

Respectfully submitted,

DATED: December 4, 2014

KRONENBERGER ROSENFELD, LLP

By: s/ Karl S. Kronenberger
Karl S. Kronenberger

Attorneys for Plaintiff

DATED: December 4, 2014

GRUENBECK & VOGELER

By: s/ William K. Vogeler
William K. Vogeler

Attorneys for Defendant Hannes Tulving, Jr.

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ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Local Rule 5-1(i)(3), the filer hereby attests that concurrence in the filing of this document has been obtained from each of the other signatories, which shall serve in lieu of their signatures on the document.

s/ Karl S. Kronenberger
Karl S. Kronenberger