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7 Attorneys for Defendant  
 FIRST DATA CORPORATION

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 10 **UNITED STATES DISTRICT COURT**  
 11 **EASTERN DISTRICT OF CALIFORNIA**  
 12 **SACRAMENTO DIVISION**

13 DAVID KNOX,  
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 Plaintiff,  
 15  
 v.  
 16 FIRST DATA CORPORATION, and  
 17 DOES 1-25,  
 18  
 Defendants.

Case No. 2:15-cv-00393-JAM-KJN

**STIPULATION FOR EXTENSION OF TIME  
 FOR DEFENDANT TO ANSWER, MOVE,  
 OR OTHERWISE PLEAD IN RESPONSE TO  
 PLAINTIFF'S COMPLAINT**

Complaint Filed: November 12, 2014  
 Removed: February 19, 2015

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1 Pursuant to General Local Rule 144(a), it is hereby STIPULATED and AGREED by and  
2 between counsel for Plaintiff, David Knox, and Defendant, First Data Corporation, that  
3 Defendant shall have 28 days from May 8, 2015 to answer, move or otherwise plead in response  
4 to the Complaint.

5  
6 The response to the Complaint is currently due on May 8, 2015, pursuant an earlier  
7 extension. Three prior extensions have been granted while the parties try to complete a final  
8 resolution of their dispute. During the prior extensions, counsel for the plaintiff has been  
9 diligently attempting to get all of the possible claimants to certain funds in the possession of First  
10 Data Corporation to release those claims so that the plaintiff and First Data Corporation could  
11 hopefully amicably resolve this matter with total finality. Plaintiff has successfully secured the  
12 release from all but one claimant. In light of the difficulty plaintiff's counsel has had to get the  
13 final claimant to release its claim, counsel for the parties have also been exploring an alternative  
14 approach to finally resolve this matter. The parties seek a further extension so that counsel for the  
15 parties can either obtain the release from the remaining claimant or, alternatively, to separately  
16 resolve this matter so that the parties can avoid the time and expense associated with an  
17 interpleader or otherwise having to litigate these proceedings. The parties believe that the  
18 additional time will aid them in resolving this matter without requiring the filing of a responsive  
19 pleading or further litigation. Pursuant to this stipulation, Defendant shall file its response no  
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later than **June 5, 2015**.

FOX ROTHSCHILD LLP

LAW OFFICES OF RANDY E. THOMAS

/s/ Ramon A. Miyar  
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Attorneys for Defendant

Attorneys for Plaintiff

Dated: May 6, 2015

Dated: May 6, 2015

Dated: May 6, 2015

SO ORDERED

/s/ John A. Mendez  
UNITED STATES DISTRICT COURT JUDGE

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