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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 PRINCETON STRATEGIC INVESTMENT
 FUND, LLC; AND PRESIDIO GROWTH
 13 LLC
 (Tax Matters Partner),
 14
 Petitioners,
 15
 v.
 16 UNITED STATES OF AMERICA,
 17
 Respondent.

CASE NO. C-04-4310-JW

**STIPULATION TO ENLARGE TIME FOR
 BRIEFING IN RESPONSE TO
 RESPONDENT’S MOTION FOR
 SUMMARY JUDGMENT**

[Civil Local Rule 6-2]

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1 Pursuant to Civil Local Rule 6-2, Petitioners Presidio Growth LLC and Princeton
2 Strategic Investment Fund, LLC (“Petitioners”) and Respondent United States jointly request an
3 enlargement of time to file briefing in response to Respondent’s recently-filed motion for
4 summary judgment. In support of this request, the parties jointly state as follows:

5 1. On Friday, August 12, 2011, Respondent filed a motion for summary judgment in
6 the above-titled case. Dkt. No. 34. Respondent’s motion involves issues of tax law, privity, and
7 collateral estoppel, and a complicated case history that dates back more than six years.

8 2. Petitioners’ opposition is currently due on August 26, 2011, and Respondent’s
9 reply is currently due on September 2, 2011. The hearing is set for October 24, 2011, at 9:00
10 a.m.

11 3. The parties request that Petitioners’ time to file their opposition be extended by
12 two weeks, to September 9, 2011, and that Respondent’s time to file its reply be extended by one
13 additional week, so that it is due September 23, 2011.

14 **Previous Time Modifications**

15 4. This Court previously granted a stipulated request to enlarge time to file an
16 answer in this action on December 20, 2004. Dkt. No. 11. This Court granted an additional
17 stipulated request to enlarge time to file an answer on January 25, 2005. Dkt. No. 15.

18 5. This Court granted Respondent’s motion to stay in this case and other related
19 cases on November 7, 2005. Dkt. No. 99 in related case *Shasta Strategic Investment Fund, LLC*
20 *and Presido Growth LLC, v. United States of America*, No. C-04-4309-JW (N.D. Cal. Nov. 7,
21 2005). This Court granted a subsequent motion to stay in this case and other related cases on
22 October 2, 2006. Dkt. No. 103 in related case *Shasta Strategic Investment Fund, LLC and*
23 *Presido Growth LLC, v. United States of America*, No. C-04-4309-JW (N.D. Cal. Oct. 2, 2006).

24 6. The cases were stayed for more than five years. This Court lifted the stay on June
25 9, 2011. Dkt. No. 32.

26 **The Requested Extensions Will Not Affect The Hearing Date Or The Case Schedule**

27 7. The hearing on the motion has been set for October 24, 2011. Dkt. No. 34. Thus,
28 the requested extensions would have no effect on the date of the hearing, which is approximately

