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DEK KETCHUM, SB #48109 1 JAY M. GOLDMAN, SB #168141 LAW OFFICES OF DEK KETCHUM 2 900 Veterans Boulevard, Suite 600 Redwood City, Calif. 94063 3 Telephone: (650) 368-2588 (650) 369-7183 Facsimile: Dekket@pacbell.net 5 JGoldman1@aol.com 6 Attorneys for Defendant Farr Financial, Inc. 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 HOWARD B. HIGGINS, an individual,) No. C 07-02200 JSW 12 Plaintiff, STIPULATION BY PLAINTIFF 13 AND DEFENDANT FARR VS. FINANCIAL, INC. TO EXTEND 14 TIME FOR ÁLL DEFENDANTS FARR FINANCIAL, INC., a California TO RESPOND TO PLAINTIFF'S 15 Corporation, ZENITH INVESTMENT THIRD AMENDED GROUP LLC, a California Limited COMPLAINT Liability Company, AMAECHI 16 Judge: Hon. Jeffery S. White Ctrm.: 2, 17th Floor GEORGE OZOR, an individual, and JOHN/JANE DOES I-X, individuals or 17 entities whose identities are unknown, Trial: None Set 18 Defendants. 19 20 21 Defendant Farr Financial, Inc. ("Farr") and Plaintiff Howard B. Higgins 22 ("Higgins"), hereby stipulate to provide for Farr to have ten (10) additional days, 23 through August 20, 2009, to file a response to Higgins' Third Amended Complaint. 24 the accompanying proposed order. Lead Farr counsel, Howard Stein, has a trial in 25 26

Good cause exists to support this stipulation and the request that this Court grant another matter which will occur prior to the existing August 10, 2009, filing deadline, and therefore requires ten additional days to prepare a response to the Third Amended Complaint.

1 There have not been any prior requests to extend the time to respond to the Third Amended Complaint. Moreover, the parties do not know of any other deadlines 2 or events set in this case, and therefore conclude that the requested ten day extension 3 will not have any other effect on the schedule of this case. 4 5 This stipulation and proposed order, if it is granted, avoids the necessity for Farr to file, and for this Court to adjudicate, an administrative motion under Local Rule 7-11 6 7 in this regard. Therefore, the parties respectfully request that the Court grant their 8 proposed order. 9 IT IS SO STIPULATED: 10 11 LAW OFFICES OF DEK KETCHUM 12 Dated: July 30, 2009 13 14 By: JAYM. GOLDMAN 15 Attorneys for Defendant Farr Financial, Inc. 16 Dated: July 30, 2009 NORMAN G. REECE, P.C 17 18 NORMAN G. REECE, JR. 19 Attorney for Plaintiff Howard B. Higgins (Pro Hac Vice) 20 21 22 23 24 25 26 27 28

LAW OFFICES OF DEK RETCHUM 900 VETERANE BLVD. SUITE 600 REDWOOD CITY CA 9406

ORDER

Good cause appearing, **IT IS SO ORDERED** that the stipulation and proposed order is **GRANTED**. Farr shall have through August 20, 2009, to file a response to the Third Amended Complaint in this mater.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 3 July ____, 2009

JON JUFFREY S. WHITE nited States District Judge

LAW OFFICES OF DEK KETCHUM 900 VETERANS BLVD. SUITE 600 REDWOOD CITY CA 94063