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LINDA HAUSER, MARIO CANTON & JOHN P. MORGAN

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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RAGHBIR SINGH,

Case No. C-07-2997 EDL

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Plaintiff,

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE TIME TO  
COMPLETE SETTLEMENT**

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v.

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LINDA G. HAUSER, MARIO CANTON,  
JOHN P. MORGAN, NATIONAL  
COMMAND LINK NETWORK 20, AND  
DOES 1-25,

Judge: The Hon. Elizabeth D. Laporte

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Date Comp. Filed: June 8, 2007

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Defendants.

Trial Date:

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**RECITAL**

On August 4, 2008, the parties participated in a mediation before Daniel Bowling and reached a settlement agreement.

On September 18, the Court issued an order dismissing this case without prejudice, and with leave to reinstate on or before 90 days for the purpose of proceeding with the litigation in the event the parties did not complete the settlement prior to that date.

Since the conclusion of the mediation, the parties have worked diligently to finalize the settlement, but the process has taken longer than expected.

The primary reason for this delay has been protracted negotiations with NCLN20, a former party to this litigation, regarding the language of a mutual release of claims between NCLN20 and the remaining defendants.

We are now on the verge reaching agreement on language of the mutual release, but it will take some additional time for the proper governmental agencies to approve the new language.

Given that we are on the verge of settlement, the parties agree that it would be a waste of the Court's resources for the plaintiff Raghbir Singh to reinstate his complaint in order to avoid dismissal with prejudice.

The parties believe that the settlement will be finalized no later than January 30, 2009.

**STIPULATION**

For the forgoing reasons, plaintiff Singh and defendants Linda Hauser, Mario Canton, and John Morgan, through their undersigned counsel, stipulate and agree to extend the time to complete the settlement from December 18, 2008 to January 30, 2009.

IT IS SO STIPULATED.

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Dated: December 17, 2008

KEKER & VAN NEST, LLP

By: /s/ Khari J. Tillery  
KHARI J. TILLERY  
Attorneys for Plaintiff  
RAGHBIR SINGH

Dated: December 17, 2008

JOSEPH P. RUSSONIELLO  
United States Attorney

By: /s/ Michael T. Pyle  
[Concurrence Obtained General Order 45 §  
X.B]  
Assistant United States Attorney  
Attorneys for Defendants

**IT IS SO ORDERED.**

Dated: December 17, 2008



THE HONORABLE JUDGE ELIZABETH D. LAPORTE