

1 WILLIAM BLUMENTHAL  
General Counsel

2 JANICE L. CHARTER Colo. Bar No. 12750  
3 DAVID M. NEWMAN Cal. Bar No. 54218  
4 THOMAS DAHDOUH N.Y. Bar No. 2222370  
Federal Trade Commission  
901 Market Street, Suite 570  
5 San Francisco, CA 94103  
Phone (415) 848-5100/ Fax (415) 848-5184  
6 jcharter@ftc.gov; dnewman@ftc.gov; tdahdouh@ftc.gov

7 ATTORNEYS FOR PLAINTIFF  
FEDERAL TRADE COMMISSION

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

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.

Case No. C08-1718-VRW

STIPULATION FOR ORDER  
EXTENDING DEADLINE FOR FILING  
RESPONSIVE PLEADINGS AND  
PROPOSED ORDER

17  
18  
19  
20 WHEREAS, Defendants NextClickMedia, LLC’s, Next Internet, LLC’s, Kenneth  
21 Chan’s and Albert Chen’s (collectively, “Defendants”) response to Plaintiff Federal Trade  
22 Commission’s (the “FTC”) Complaint is currently due on Tuesday, September 30, 2008;

23 WHEREAS, the parties to this action have continued to exchange information with the  
24 intention of exploring the possibility of settlement of this matter;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
26 to Plaintiff’s Complaint in order to focus on settlement discussions; and

27 WHEREAS the parties believe that additional time will increase the likelihood that they  
28 will be able to reach a settlement of this matter;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and  
2 Defendants, through their respective counsel, that Defendants' time to move, answer or  
3 otherwise respond to the Complaint shall be and hereby is extended to and including December  
4 1, 2008; and

5 IT IS FURTHER STIPULATED that the Case Management Conference, currently  
6 scheduled for October 16, 2008, at 3:30 p.m., be rescheduled to <sup>January 22, 2009</sup> ~~January 19, 2008~~, at 3:30 p.m.,  
7 and that the date for filing the Case Management Statement be extended to January 12, 2008.

9 Dated: 08/29/08

10 /s/  
MICHAEL C. LYNCH  
KELLEY DRYE & WARREN  
ATTORNEY FOR DEFENDANTS

11 Dated: 08/29/08

12 /s/  
JANICE L. CHARTER  
DAVID M. NEWMAN  
THOMAS N. DAHDOUH  
ATTORNEYS FOR PLAINTIFF

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: 9/12/2008

19 VAUGHN R. WALKER  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
GRANTED  
Judge Vaughn R Walker