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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 Monday, May 4, 2009;

23 WHEREAS the parties have recently concluded several days of intensive settlement  
24 discussions and are currently negotiating the terms of a settlement agreement;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
26 to Plaintiff's Complaint in order to finalize those settlement negotiations;

27 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and  
28 Defendants, through their respective counsel, that Defendants' time to move, answer or

1 otherwise respond to the Complaint shall be and hereby is extended to and including August 3,  
2 2009; and

3 IT IS FURTHER STIPULATED that the Case Management Conference, currently  
4 scheduled for June 25, 2009, at 3:30 p.m., be rescheduled to September 24, 2009, at 3:30 p.m.,  
5 and that the date for filing the Case Management Statement be extended to September 14, 2009.  
6

7 Dated: 4/30/09

/s/

MICHAEL C. LYNCH  
D. REED FREEMAN  
KELLEY DRYE & WARREN LLP  
ATTORNEY FOR DEFENDANTS

10 Dated: 4/30/09

/s/

JANICE L. CHARTER  
DAVID M. NEWMAN  
THOMAS N. DAHDOUN  
ATTORNEYS FOR PLAINTIFF

14 **ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 Dated: May 5, 2009

18 VAUGHN R. WALKER  
UNITED STATES DISTRICT COURT JUDGE

