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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

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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, August 3, 2009;

23 WHEREAS plaintiff's counsel and defendants have reached agreement on a settlement,  
24 and Commission staff is prepared to recommend that the Commission approve that settlement;

25 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
26 to Plaintiff's Complaint while the Commission considers that recommendation;

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 November  
2 2, 2009; and

3 IT IS FURTHER STIPULATED that the Case Management Conference, currently  
4 scheduled for September 24, 2009, at 3:30 p.m., be rescheduled to December <sup>17</sup>~~21~~, 2009, at 3:30  
5 p.m., and that the date for filing the Case Management Statement be extended to December 11,  
6 2009.

8 Dated: 7/22/2009 /s/ \_\_\_\_\_  
9 MICHAEL C. LYNCH  
10 D. REED FREEMAN  
11 KELLEY DRYE & WARREN LLP  
12 ATTORNEY FOR DEFENDANTS

11 Dated: 7/22/2009 /s/ \_\_\_\_\_  
12 JANICE L. CHARTER  
13 DAVID M. NEWMAN  
14 THOMAS N. DAHDOUH  
15 ATTORNEYS FOR PLAINTIFF

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: September 17, 2009 \_\_\_\_\_  
19 VAUGHN R. WALKER  
20 UNITED STATES DISTRICT COURT JUDGE

