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Attorneys for Defendant NBCUniversal Media, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANURAG TIWARI,

Plaintiff,

vs.

NBC UNIVERSAL, INC.,

Defendant.

) No. C08-3988 EMC

) **STIPULATION TO EXTEND TIME**  
) **FOR DEFENDANT NBCUNIVERSAL**  
) **MEDIA, LLC'S MOTION TO**  
) **RECOVER ATTORNEYS' FEES AND**  
) **COSTS; [PROPOSED] ORDER**

1 Defendant NBCUniversal Media, LLC (“NBCUniversal”) and Plaintiff Anurag Tiwari  
2 (“Plaintiff”), through their counsel of record, HEREBY STIPULATE to the following:

3 WHEREAS, on October 25, 2011, this Court issued an order denying NBCUniversal’s  
4 motion to dismiss Plaintiff’s 42 U.S.C. Section 1983 claim, denying NBCUniversal’s motion to  
5 strike Plaintiff’s intentional infliction of emotional distress claim, granting NBCUniversal’s motion  
6 to dismiss Plaintiff’s defamation claim, and denying NBCUniversal’s motion for a protective order  
7 staying discovery (Dkt. No. 110);

8 WHEREAS, this Court has not entered Judgment striking the defamation cause of action;

9 WHEREAS, NBCUniversal intends to file a motion to recover attorneys’ fees and costs  
10 regarding the defamation claim pursuant to Code of Civil Procedure § 425.16(c);

11 WHEREAS, NBCUniversal has requested an extension of time to file its proposed fee  
12 motion and Plaintiff has, without conceding the propriety or merits of NBCUniversal’s motion,  
13 agreed to NBCUniversal’s extension request;

14 NOW, THEREFORE, the parties do hereby stipulate and agree, and they request that this  
15 Court Order, that NBCUniversal’s time for filing a motion to recover attorneys’ fees and costs  
16 pursuant to Code of Civil Procedure § 425.16(c) be extended until 30 days after the Court enters  
17 Judgment.

18 Respectfully submitted this 4th day of November, 2011.

19  
20 DAVIS WRIGHT TREMAINE LLP

21  
22 By: /s/ Thomas R. Burke  
23 Thomas R. Burke  
24 Attorneys for Defendant NBCUniversal Media,  
25 LLC

21  
22 By: /s/ Elizabeth Pritzker  
23 Elizabeth Pritzker  
24 Attorneys for Plaintiff Anurag Tiwari

25 **Pursuant to Stipulation, It Is So Ordered:**

26 DATE: 11/8/11

27 Hon. Ed  
28 U.S. Dist

