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Attorneys for Defendant NBC Universal, Inc.

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

DAVIS WRIGHT TREMAINE LLP

11 ANURAG TIWARI,
 12 Plaintiff,
 13 v.
 14 NBC UNIVERSAL, INC.,
 15 Defendant.
 16

Case No. C08-3988 MHP

17 **JOINT STIPULATION EXTENDING**
DEADLINE FOR RESPONSIVE
PLEADINGS SO THAT PARTIES MAY
FINALIZE SETTLEMENT TERMS AND
[PROPOSED] ORDER

DAVIS WRIGHT TREMAINE LLP

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Plaintiff Anurag Tiwari, proceeding *in propria persona*, and Defendant NBC Universal, Inc., through its counsel of record, are conferring if they can settle this lawsuit. So the parties may have additional time to finalize the terms of the settlement, the parties respectfully request that the Court extend the 60-day period in which Defendant may file an anti-SLAPP motion under California Code of Civil Procedure § 425.16 by an additional 30 days, to a new deadline of October 7, 2010. *See* Code of Civ. Proc. § 425.16(f) (stating that the special motion to strike may be filed "... in the court's discretion, at any time upon terms it deems proper"). Additionally, in accordance with Local Rule 6-1(a), Plaintiff and Defendant together ask this Court to extend the current deadline for Defendant to answer or otherwise respond to Plaintiff's Second Amended Complaint by an additional 30 days, to a new deadline of October 7, 2010.

Respectfully submitted this 29th day of July, 2010.

DAVIS WRIGHT TREMAINE, LLP

By: /s/ Thomas R. Burke
Thomas R. Burke
Attorneys for Defendant NBC Universal, Inc.

By: /s/ Anurag Tiwari
Anurag Tiwari
In Propria Persona

Pursuant to Stipulation, It Is So Ordered:

DATE: 7/30/2010

Hon. Marilyn H. Patel
U.S. District Court



1 **Proof of Service**

2 I, N. Majorko, declare under penalty of perjury under the laws of the State of California that
3 the following is true and correct:

4 I am employed in the City and County of San Francisco, State of California, in the office of
5 a member of the bar of this court, at whose direction the service was made. I am over the age of
6 eighteen (18) years, and not a party to or interested in the within-entitled action. I am an employee
7 of DAVIS WRIGHT TREMAINE LLP, and my business address is 505 Montgomery Street, Suite
8 800, San Francisco, California 94111. I caused to be served the following document:

9 **JOINT STIPULATION EXTENDING DEADLINE FOR RESPONSIVE PLEADINGS SO
10 THAT PARTIES MAY FINALIZE SETTLEMENT TERMS AND [PROPOSED] ORDER**

11 I caused the above document to be served on each person on the attached list by the
12 following means:

- 13 I enclosed a true and correct copy of said document in an envelope and placed it for collection
14 and mailing with the United States Post Office on **July 29, 2010**, following the ordinary
15 business practice.
16 (*Indicated on the attached address list by an [M] next to the address.*)
- 17 I enclosed a true and correct copy of said document in an envelope, and placed it for collection
18 and mailing via Federal Express on _____, for guaranteed delivery on _____,
19 following the ordinary business practice.
20 (*Indicated on the attached address list by an [FD] next to the address.*)
- 21 I consigned a true and correct copy of said document for facsimile transmission on _____.
22 (*Indicated on the attached address list by an [F] next to the address.*)
- 23 I enclosed a true and correct copy of said document in an envelope, and consigned it for hand
24 delivery by messenger on _____.
25 (*Indicated on the attached address list by an [H] next to the address.*)
- 26 A true and correct copy of said document was emailed on _____.
27 (*Indicated on the attached address list by an [E] next to the address.*)

28 I am readily familiar with my firm's practice for collection and processing of
correspondence for delivery in the manner indicated above, to wit, that correspondence will be
deposited for collection in the above-described manner this same day in the ordinary course of
business.

I declare under penalty of perjury, under the laws of the State of California, that the
foregoing is true and correct.

Executed on **July 29, 2010**, at San Francisco, California.



N. Majorko

Service List

Key:	[M] Delivery by Mail	[FD] Delivery by Federal Express	[H] Delivery by Hand
	[F] Delivery by Facsimile	[FM] Delivery by Facsimile and Mail	[E] Delivery by Email

[M] Anurag Tiwari Plaintiff
2250 Monroe Avenue, #129
Santa Clara, CA 95050