

1 MARC J. FAGEL (Cal. Bar. No. 154425)
ROBERT L. MITCHELL (Cal. Bar No. 161354)
2 mitchellr@sec.gov
ROBERT S. LEACH (Cal. Bar No. 196191)
3 leachr@sec.gov
SUSAN FLEISCHMANN (Cal. Bar No. 207194)
4 fleischmanns@sec.gov

5 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
6 44 Montgomery Street, Suite 2600
San Francisco, California 94104
7 Telephone: (415) 705-2500
Facsimile: (415) 705-2501
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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 SECURITIES AND EXCHANGE COMMISSION, No. 3:09-cv-02302-JSW

14 Plaintiff,

15 vs.

16 PEGASUS WIRELESS CORPORATION, JASPER
17 KNABB, and STEPHEN DURLAND,

18 Defendants,

19 and

20 AERO-MARINE, LLC and TAMMY KNABB,

21 Relief Defendants.

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINES
AND ORDER REQUIRING
22 RESPONSE ON DOCKET NO. 93**

23 On March 24, 2011, based on a stipulation of the parties, the Court entered an order extending
24 the deadline for dispositive motions in this case to July 15, 2011, in order to allow plaintiff Securities
25 and Exchange Commission to consider whether to ratify proposed settlements with defendant Jasper
26 Knabb and relief defendant Tammy Knabb, as a result of a Court-ordered mediation.
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28 Stipulation and ~~Proposed~~ Order to Extend
Deadlines
SEC v. Pegasus Wireless Corporation, et al.
Case No. 3:09-cv-02302-JSW

1 Since that time, the Commission staff has submitted its settlement recommendation for
2 review. However, the Commission requires that the staff obtain additional tax and financial
3 information in order to consider and vote on the recommendation. The parties have already requested
4 this information and expect to have it shortly.

5 In light of this unexpected delay, and to allow the Commission to vote whether to ratify
6 settlements that would conclude the litigation as to Jasper Knabb and Tammy Knabb, the parties
7 respectfully request that the Court enter an order that: (1) vacates the current deadline of July 15,
8 2011 for the hearing of dispositive motions in this case; (2) sets a new deadline of August 12, 2011;
9 and schedule a case management conference for August 12, 2011, or as soon thereafter as the Court's
10 schedule permits.

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12 Dated: May 6, 2011

Respectfully submitted,

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15 /s/ Robert L. Mitchell

Robert L. Mitchell
Robert S. Leach
Susan Fleischmann

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18 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

19 Dated: May 6, 2011

20
21 /s/ Christopher Bruno

Christopher Bruno
BRUNO & DEGENHARDT
10615 Judicial Drive
Suite 703
Fairfax, VA 22030

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23
24 Attorneys for Defendant
JASPER KNABB

1 Dated: May 6, 2011

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3 /s/ Nina Marino
4 Nina Marino
5 KAPLAN MARINO, PC
6 9454 Wilshire Blvd Ste 500
7 Suite 500
8 Beverly Hills, CA 90212-2908

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10 Attorneys for Relief Defendant
11 TAMMY KNABB

12 **ORDER**

13 PURSUANT TO STIPULATION, IT IS ORDERED THAT: (1) the current deadline of July
14 15, 2011 for the hearing of dispositive motions in this case is vacated; (2) the new deadline for hearing
15 dispositive motions is August 12, 2011; and (3) a case management conference is hereby scheduled for

16 August 26, 2011 at 1:30 p.m. It is FURTHER ORDERED that the parties shall advise the Court
17 by May 20, 2011, whether a ruling is necessary on the Motion to
18 Appoint Counsel filed by Mr. Durland (Docket No. 93), or whether
19 that matter has been resolved.

20 SO ORDERED.

21 Date: May 9, 2011

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24 U.S. District Judge