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 and American Surety Company, Inc.
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9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**
 11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 GONZALES & GONZALES BONDS
 AND INSURANCE AGENCY, INC. and
 16 AMERICAN SURETY COMPANY, INC.,

17 Defendants.
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19 GONZALES & GONZALES BONDS
 AND INSURANCE AGENCY, INC. and
 20 AMERICAN SURETY COMPANY, INC.

21 Counterclaimants,

22 vs.

23 UNITED STATES DEPARTMENT OF
 HOMELAND SECURITY, JANET
 NAPOLITANO, in her capacity as
 24 SECRETARY OF UNITED STATES
 DEPARTMENT OF HOMELAND
 25 SECURITY

26 Counterdefendants.
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Case No. C 09-04029 EMC

Assigned to the
 Honorable Edward M. Chen

**STIPULATION TO ENLARGE TIME
 SET FORTH IN THE REMAND
 ORDER**

1 Pursuant to Civil L.R. 6-1, 6-2, and 7-12, Plaintiff United States of America,
2 Counterdefendants United States Department of Homeland Security and Janet Napolitano, in her
3 capacity as Secretary of United States Department of Homeland Security (collectively “United
4 States”), on the one hand, and Defendants/Counterclaimants Gonzales & Gonzales Bonds and
5 Insurance Agency, Inc. and American Surety Company, Inc. (“G&G/ASC”), on the other hand,
6 by and through their respective counsel of record, and stipulate and agree as follows:

7 1. The Court issued a Remand Order on September 25, 2012, dkt. 141. The Order
8 directs G&G, within 60 days of remand, to supplement the record before DHS with its defenses
9 to each bond breach determination and an explanation of why those defenses should bar
10 collection of the bonds.

11 2. Given that nearly 60 bonds have been remanded to DHS, G&G asserts that it
12 needs additional time to present its defenses and explanations of why those defenses should bar
13 collection. The parties have agreed to a 60 day extension for G&G to provide this information
14 to DHS for each of the remanded bonds. The new deadline would be January 23, 2013.

15 3. This is the first proposed time modification to the Remand Order.

16 4. The requested enlargement of time would not affect the schedule for the case.

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18 IT IS SO STIPULATED.
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1 Dated: October 31, 2012

2 STUART F. DELERY
3 Acting Assistant Attorney General
4 MELINDA HAAG
5 United States Attorney

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America

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 Dated: November 8, 2012

