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10 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION**

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 v.)

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

17 Defendants.)

18 GONZALES & GONZALES BONDS)
19 AND INSURANCE AGENCY, INC., and)
20 AMERICAN SURETY COMPANY, INC.,)

21 Counterplaintiffs,)

22 v.)

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

26 Counterdefendants.)
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CASE NO. CV-09-04029 MHP

**STIPULATION ENLARGING
TIME FOR UNITED STATES
TO FILE ANSWER TO
COUNTERCLAIM**

1 STIPULATION ENLARGING TIME FOR UNITED STATES
2 TO FILE ANSWER TO COUNTERCLAIM

3 Pursuant to Civil L. R. 6-1(a), 6-2 and 7-12, the parties, through their respective counsel,
4 stipulate and agree as follows:

5 1. On August 28, 2009, the United States filed its Complaint (Dkt. # 1) in the instant
6 matter.

7 2. On October 22, 2009, Gonzales & Gonzales Bonds and Insurance Agency, Inc.
8 (G&G) and American Surety Company, Inc. (ASC) filed its Answer to the Complaint and
9 Counterclaim (Dkt. # 9).

10 3. On July 27, 2010, the Court entered its Memorandum and Order (Dkt. # 48), which,
11 *inter alia*, triggered the time for the United States to file an answer to the Defendants'
12 Counterclaim by August 10, 2010. FED. R. CIV. P. 12(a)(4)(A).

13 4. The parties stipulate that the United States' time within which to answer the
14 Defendants' Counterclaim be enlarged by 30 days to and including September 9, 2010.

15 5. The requested stipulation would have no effect on the schedule for the case.

16 Therefore, the parties stipulate that, the United States' time within which to answer the
17 Defendants' Counterclaim be enlarged by 30 days to and including September 9, 2010.

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2 IT IS SO STIPULATED.
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4 Dated: August 6, 2010
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6 ROXBOROUGH, POMERANCE,
7 NYE & ADREANI, LLP

TONY WEST
Assistant Attorney General

JOSEPH P. RUSSONIELLO
United States Attorney

8
9 /s/ David R. Ginsberg

/s/ E. Kathleen Shahan

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13 Counterclaimants**

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15 **GONZALES & GONZALES**
16 **BONDS AND INSURANCE**
17 **AGENCY, INC. and**
18 **AMERICAN SURETY**
19 **COMPANY, INC.**

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