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5 Attorney for Defendants JUSTIN BEGET, an individual,
FIRST STREET CAPITAL, LLC, dba DC EAST
6 FREIGHT, UNISHIPPERS, ERIN BREEN, an
individual, and MONKEY LOGISTICS, LLC
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 MERCARI, INC. dba, UNISHIPPERS,
11 Plaintiff,

Case No.: C09-04726 MHP

12 vs.

**STIPULATION TO EXTEND TIME
TO RESPOND TO FIRST
AMENDED COMPLAINT BY NOT
MORE THAN 30 DAYS (L.R. 8-3)**

13 JUSTIN BEGET, an individual,
14 MATTHEW WALSH, an individual,
FIRST STREET CAPITAL, LLC, dba
15 DC EAST FREIGHT, UNISHIPPERS, a
Maryland limited liability company,
16 ERIN BREEN, an individual, MONKEY
LOGISTICS, LLC, a Nevada limited
17 liability company, MOLGER, INC., a
California corporation, DNAFREIGHT,
18 a California corporation, MOUNTAIN
VIEW LOGISTICS, LLC dba
19 NEWBURYPORT COMPANIES and
dba MOVEMENT LOGISTICS, a
20 Maryland limited liability company,
VOXX SERVICES, LLC a Maryland
21 entity of unknown form, COLD SPRING
INVESTMENTS, LLC dba
22 MOVEMENT LOGISTICS, a Maryland
limited liability company, COLD
23 SPRING INVESTMENTS NO. 1,
LIMITED PARTNERSHIP dba
24 MOVEMENT LOGISTICS, a Maryland
limited partnership, COLD SPRING
25 INVESTMENTS NO. 2, LLP dba
MOVEMENT LOGISTICS, a Maryland
26 limited liability partnership, STEFAN
TRIANDAFILOU, an individual, and
DOES 1-50,

Complaint served: 1/9/09
Current response date: 12/2/09
New response date: 12/18/09

27 Defendants.
28

1 Plaintiff MERCARI, INC. dba, UNISHIPPERS, on the one hand (“Mercari ”),
2 and Defendants JUSTIN BEGET, an individual, FIRST STREET CAPITAL, LLC ,
3 dba DC EAST FREIGHT, UNISHIPPERS, a Maryland limited liability company,
4 ERIN BREEN, an individual, and MONKEY LOGISTICS, LLC, a Nevada limited
5 liability company, on the other hand (jointly, the “Parties”), hereby enter into this
6 Stipulation Extending Time to Respond to Plaintiff’s First Amended Complaint
7 (“Stipulation”) with reference to the following facts:

8 WHEREAS, counsel for Defendants JUSTIN BEGET, an individual, FIRST
9 STREET CAPITAL, LLC , dba DC EAST FREIGHT, UNISHIPPERS, a Maryland
10 limited liability company, ERIN BREEN, an individual, and MONKEY LOGISTICS,
11 LLC, a Nevada limited liability company, accepted service of Plaintiff’s First
12 Amended Complaint which was served via mail on November 9, 2009;

13 WHEREAS, the response of Defendants JUSTIN BEGET, an individual,
14 FIRST STREET CAPITAL, LLC , dba DC EAST FREIGHT, UNISHIPPERS, a
15 Maryland limited liability company, ERIN BREEN, an individual, and MONKEY
16 LOGISTICS, LLC, a Nevada limited liability company, is due on or before December
17 2, 2009;

18 WHEREAS, the Parties desire to extend the time for these Defendants to
19 respond to the First Amended Complaint an additional sixteen (16) days from the
20 original response date, to and including December 18, 2009;

21 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and
22 between the Parties, that Defendants JUSTIN BEGET, an individual, FIRST STREET
23 CAPITAL, LLC , dba DC EAST FREIGHT, UNISHIPPERS, a Maryland limited
24 liability company, ERIN BREEN, an individual, and MONKEY LOGISTICS, LLC, a
25 Nevada limited liability company, should have an extension of time of sixteen

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1 (16) days to respond to the First Amended Complaint, to and including December 18,
2 2009.

3 IT IS SO STIPULATED.

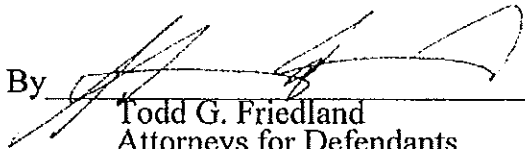
4 Dated: November 25, 2009

McNAMARA, DODGE, NEY, BEATTY, SLATTERY,
PFALZER, BORGES & BROTHERS LLP

5
6 By 
7 J. Wesley Smith
8 Gary A. Watt
9 Christopher T. Lustig
10 Attorneys for Plaintiff
11 MERCARI, INC. dba UNISHIPPERS

12 Dated: November 15, 2009

STEPHENS FRIEDLAND LLP

13 By 
14 Todd G. Friedland
15 Attorneys for Defendants
16 JUSTIN BEGET, FIRST STSREET
17 CAPITAL, LLC, dba DC EAST
18 FREIGHT, UNISHIPPERS, ERIN
19 BREEN, and MONKEY LOGISTICS
20 LLC

21 12/3/2009

