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7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 Maxine Ellis,

13 Plaintiff,

14 vs.

15 DotNext Inc., LeapFish Inc., Behnam
Behrouzi, Russell Safar, and DOES 1-10,

16 Defendants.
17

Case No. 3:10-cv-01599-BZ

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEFENDANTS'
TIME TO RESPOND TO THE
SUPPLEMENTAL COMPLAINT**

Case Filed: April 14, 2010
Judge: Hon. Bernard Zimmerman

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19 On February 9, 2011, the Court issued an Order granting Plaintiff Maxine Ellis leave to
20 file a supplemental complaint. (PACER Document # 73) The Order also required Defendants to
21 respond to the supplemental complaint on or before February 23, 2011.

22 However, the parties have reached a tentative settlement. The parties are in the final
23 stages of negotiating the terms of the settlement and are in the process of finalizing a settlement
24 agreement.

25 As it appears that the parties will settle this action, Plaintiff Maxine Ellis and Defendants
26 DotNext Inc. and Behnam Behrouzi, by and through their respective counsel of record, hereby
27 stipulate, pursuant to Civil Local Rules 6-1 and 6-2, for an order extending the date by which
28 Defendants must respond to the supplemental complaint by 30 days to March 25, 2011. Good

1 cause exists for this request because, if this action settles as anticipated, the extension of time will
2 allow Defendants to avoid the unnecessary expense, including attorneys' fees, associated with
3 responding to the supplemental complaint. This Stipulation is supported by the accompanying
4 Declaration of Bruno Tarabichi.
5

6 Dated: February 21, 2011

Respectfully submitted,

OWENS TARABICHI LLP

9 By /s/ Bruno Tarabichi

10 David R. Owens
11 Bruno W. Tarabichi
Attorneys for Defendants

12 Dated: February 21, 2011

Respectfully submitted,

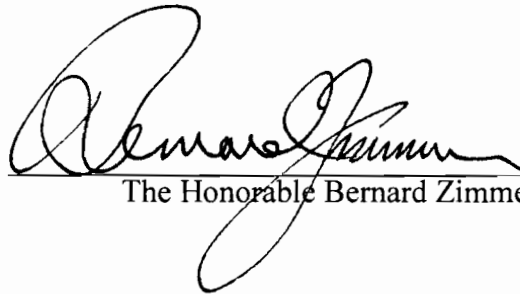
HIGHMAN, HIGHMAN & BALL

15 By /s/ Bruce Highman

16 Bruce Highman
Attorneys for Plaintiff

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18 IT IS SO ORDERED.

19 Dated: 22 Feb 11


The Honorable Bernard Zimmerman