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26
 27 **CAPTION CONTINUED ON NEXT PAGE**

28

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States Small Business Administration in
its capacity as Receiver for Rocket Ventures II
SBIC, L.P.,

Plaintiff,

vs.

Rocket Ventures II, L.P., a California limited
partnership; Rocket Ventures II CEO Fund, L.P.,
a California limited partnership; Rocket
Ventures SBIC Partners, LLC, a Delaware
limited liability company; Cordusio Societa
Fiduciaria Per Azioni Lozia Federico; Kenneth
W.& Melissa Baldwin; Paul Cantwell; Peter
Ayrton Cheese; Yves Derville; Richard S.
Cuccioli; Alistair Anderson Donald; Philippe
Gire; Jean-Claude Guez; Joseph Hawes &
Christopher Eyden; Alan John Healey; Craig
Foster Heimark; David E. Kropp; Gregory
Charles Meekings; Michele Liberato; Fred
Cucchi; ValorLife; Alberto Gandini; Rijete Pty.
Ltd.; Christopher Stainton; Tyna Development;
Thomas Tynan; Patrice Vinet; Hahei Limited;
Michel Saunier; Michel Roujansky; Nigel
Backwith; Justine Lumb; Andrew Middleton;
Ajmair Singh Bhullar; Estate of Grant A. Dove;
Luca Casiraghi; David Mather,

Defendants.

Case No.: 3:10-cv-04425-JSW

**STIPULATION BETWEEN PLAINTIFF
RECEIVER AND DEFENDANTS PAUL
CANTWELL, KENNETH W. AND
MELISSA BALDWIN, THOMAS
TYNAN, CRAIG HEIMARK AND
RICHARD CUCCIOLI FOR
ADDITIONAL THIRTY DAYS TO
RESPOND TO AMENDED
COMPLAINT; [~~PROPOSED~~] ORDER**

[L.R. 6-1]

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1 Plaintiff United States Small Business Administration in its capacity as Receiver for
2 Rocket Ventures II SBIC, L.P, (“Plaintiff Receiver”) and newly added Defendants Paul
3 Cantwell, Kenneth W. and Melissa Baldwin, Thomas Tynan, Craig Heimark, and Richard
4 Cuccioli (the “Newly Named Five Defendants”), by and through their respective counsel of
5 record, hereby stipulate and agree as follows:

6 **WHEREAS,**

7 Plaintiff Receiver filed an Amended Complaint on January 18, 2012;

8 The Newly Named Five Defendants hereby agree to accept service of the Amended
9 Complaint;

10 The time previously set for newly named parties to respond to the Amended Complaint
11 has been ordered to be on or before March 21, 2012;

12 The parties are desirous of engaging in informal discussions concerning the claims
13 against the Newly Named Five Defendants;

14 **NOW, THEREFORE,**

15 The Plaintiff Receiver and the Newly Named Five Defendants hereby agree that the time
16 for the Newly Named Five Defendants to respond to the Amended Complaint shall be extended
17 thirty days and the Newly Named Five Defendants shall have up to, and including, April 12,
18 2012 to answer, move or otherwise respond to the Amended Complaint.

19
20 **IT IS SO STIPULATED.**

21
22 The content of this document is acceptable to all persons who have signed below.

23
24 Dated: March 15, 2012

SCHNADER HARRISON SEGAL & LEWIS LLP

25 By: /s/ T. Scott Tate

26 T. Scott Tate

27 Counsel for the Plaintiff

28 United States Small Business Administration in its capacity
as Receiver for Rocket Ventures II SBIC, L.P.

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Dated: March 15, 2012

BRYAN CAVE LLP

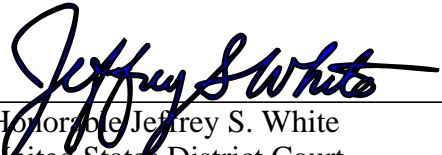
By: /s/ Tracy M. Talbot
Tracy M. Talbot

Attorneys for Defendants
KENNETH W. & MELISSA BALDWIN, PAUL
CANTWELL, RICHARD S. CUCCIOLI, CRAIG
FOSTER HEIMARK, and THOMAS TYNAN

[PROPOSED] ORDER

Pursuant to Stipulation, it is **SO ORDERED**.

Dated: March 16, 2012



Honorable Jeffrey S. White
United States District Court
Northern District of California

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