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12 Administration in its capacity as Receiver for Rocket  
Ventures II SBIC, L.P.

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17 Attorney for Defendants  
18 Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life  
(Vaduz/Lichtenstein), Yves Derville, Philippe Gire, Jean-  
19 Claude Guez, Michael Roujansky, Michel Saunier, Patrice  
Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton  
20 Cheese, The Reverend Canon Joseph Hawes and Mr.  
Christopher Eyden, Alan John Healey, Justine Lumb,  
21 Gregory Charles Meekings, Andrew Middleton

22 UNITED STATES DISTRICT COURT  
23 NORTHERN DISTRICT OF CALIFORNIA  
24 SAN FRANCISCO DIVISION

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

Case No.: CV-10-4425 JSW

27 Plaintiff,

28 **CAPTION CONTINUED ON NEXT PAGE**

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Stipulation for Additional Thirty Days to Respond to Amended Complaint

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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 & Chrisopher 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.: CV-10-4425 JSW

**STIPULATION BETWEEN PLAINTIFF RECEIVER AND DEFENDANTS FRED CUCCHI, ALBERTO GANDINI, MICHELE LIBERATO, VALOR LIFE (VADUZ/LICHTENSTEIN), YVES DERVILLE, PHILIPPE GIRE, JEAN-CLAUDE GUEZ, MICHAEL ROUJANSKY, MICHEL SAUNIER, PATRICE VINET, NIGEL BACKWITH, AJMAIR SINGH BHULLAR, PETER AYRTON CHEESE, THE REVEREND CANON JOSEPH HAWES AND MR. CHRISTOPHER EYDEN, ALAN JOHN HEALEY, JUSTINE LUMB, GREGORY CHARLES MEEKINGS, ANDREW MIDDLETON FOR ADDITIONAL THIRTY DAYS TO RESPOND TO AMENDED COMPLAINT; [PROPOSED] ORDER**

Plaintiff United States Small Business Administration in its capacity as Receiver for Rocket Ventures II SBIC, L.P., (“Plaintiff Receiver”) and newly added Defendants Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life (Vaduz/Lichtenstein), Yves Derville, Philippe Gire, Jean-Claude Guez, Michael Roujansky, Michel Saunier, Patrice Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton Cheese, The Reverend Canon Joseph Hawes and Mr. Christopher Eyden, Alan John Healey, Justine Lumb, Gregory Charles Meekings, Andrew Middleton, (the “Newly Named European Defendants”)<sup>1</sup>, by and through their respective counsel of record, hereby stipulate and agree as follows:

**WHEREAS,**

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

<sup>1</sup> By filing an Appearance and entering this Stipulation, the Newly Named European Defendants do not waive any potential objections to personal jurisdiction or service of process.

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

3 The parties are currently involved in settlement discussions to resolve the claims against  
4 the Newly Named European Defendants;

5 **NOW, THEREFORE,**

6 The Plaintiff Receiver and the Newly Named European Defendants hereby agree that the  
7 time for the Newly Named European Defendants to respond to the Amended Complaint shall be  
8 extended twenty-two days and the Newly Named European Defendants shall have up to, and  
9 including, April 12, 2012 to answer, move, or otherwise respond to the Amended Complaint.

10 **IT IS SO STIPULATED:**

11 Dated: March 21, 2012

SCHNADER HARRISON SEGAL & LEWIS LLP

12 By: /s/ Gregory C. Nuti  
13 Gregory C. Nuti  
14 Attorneys for Plaintiff  
15 United States Small Business  
16 Administration in Its Capacity as Receiver  
17 for Rocket Ventures II SBIC, L.P.

18 *Pursuant to General Order No. 45 § X.B., the filer attests that concurrence*  
19 *in the filing of this document has been obtained from the above signatory.*

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Dated: March 21, 2012

DEWEY & LEBOEUF LLP

By: /s/ Diana Hughes  
Diana Hughes  
Attorney for Defendants

Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life (Vaduz/Lichtenstein), Yves Derville, Philippe Gire, Jean-Claude Guez, Michael Roujansky, Michel Saunier, Patrice Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton Cheese, The Reverend Canon Joseph Hawes and Mr. Christopher Eyden, Alan John Healey, Justine Lumb, Gregory Charles Meekings, Andrew Middleton

**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS SO ORDERED:

Dated: March 22, 2012

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