

1 NEAL L. WOLF & ASSOCIATES, LLC
 2 Neal L. Wolf (CA Bar No. 202129)
 3 155 N. Wacker Drive, Suite 1910
 4 Chicago, IL 60606
 5 Main: (312) 228-4990
 6 Fax: (312) 228-4988
 7 E-mail: nwolf@nealwolflaw.com

8 *Attorney for Defendants Jean-Claude Guez, Michele Liberato,*
 9 *Yves Derville, Philippe Gire, Michel Roujansky, Michel Saunier,*
 10 *and Patrice Vinet*

11 T. Scott Tate (Bar No. 118427)
 12 Gregory C. Nuti (Bar No. 151754)
 13 Melissa S. Lor (Bar No. 245515)
 14 Schnader Harrison Segal & Lewis LLP
 15 One Montgomery Street, Suite 2200
 16 San Francisco, CA 94104
 17 E-mail: state@schnader.com
 18 E-mail: gnuti@schnader.com
 19 E-mail: mlor@schnader.com
 20 Telephone: (415) 364-6700
 21 Facsimile: (415) 364-6875

22 Arlene M. Embrey (FL Bar No. 125539)
 23 Trial Attorney, Office of General Counsel
 24 U.S. Small Business Administration
 25 409 3rd Street, S.W.
 26 Washington, D.C. 20416
 27 E-mail: arlene.embrey@sba.gov
 28 Telephone: (202) 205-6796
 Facsimile: (202) 481-0324

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

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

25 United States Small Business Administration in) Case No. CV-10-4425 JSW
 26 its capacity as Receiver for Rocket Ventures II)
 27 SBIC, L.P.,)
 28)
 Plaintiff,)
Caption Continued on Next Page)

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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 & 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; and David Mather,

Defendants.

) **STIPULATION BETWEEN**
) **DEFENDANTS JEAN-CLAUDE GUEZ,**
) **MICHELE LIBERATO, YVES**
) **DERVILLE, PHILIPPE GIRE, MICHEL**
) **ROUJANSKY, MICHEL SAUNIER,**
) **AND PATRICE VINET AND**
) **PLAINTIFF RECEIVER FOR AN**
) **ADDITIONAL TWENTY ONE DAYS**
) **TO RESPOND TO THE AMENDED**
) **COMPLAINT;**
) **[PROPOSED] ORDER**

Defendants Jean-Claude Guez, Michele Liberato, Yves Derville, Philippe Gire, Michel Roujansky, Michel Saunier, and Patrice Vinet (the “Defendants”)¹ and Plaintiff United States Small Business Administration in its capacity as Receiver for Rocket Ventures II SBIC, L.P. (“Plaintiff Receiver”), 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;

The parties engaged in settlement negotiations in January through May, 2012 (the “Prior Negotiations”);

¹ By entering this stipulation, the above-named Defendants do not waive any potential objections to personal jurisdiction or service of process.

1 During the prior negotiations, the Defendants were represented by Dewey & LeBoeuf LLP
2 (“D&L”);

3 On May 11, Defendants filed a Motion for Extension of Time to Answer or Otherwise
4 Respond to the Amended Complaint (the “Motion,” Dkt. 63) that was granted by Order dated May
5 22, 2012 (the “Order,” Dkt. No.71.);

6 D&L closed its doors on or about May 15, 2012 and the above-named Defendants had to
7 obtain new counsel;

8 Pursuant to the Order, Defendants were given until and including June 25, 2012 to answer or
9 otherwise respond to the Amended Complaint;

10 On June 14, 2012, the above-named Defendants retained Neal Wolf & Associates, LLC
11 (“NW&A”) to represent them in this matter;

12 The parties are currently involved in settlement discussions to resolve the claims against the
13 above-named Defendants;

14 **NOW, THEREFORE,**

15 The above-named Defendants and Plaintiff Receiver hereby agree that the time for the above-
16 named Defendants to respond to the Amended Complaint shall be extended twenty-one days and the
17 above-named Defendants shall have up to, and including, July 16, 2012 to respond to the Amended
18 Complaint.

19 **IT IS SO STIPULATED:**

20 Dated: June 22, 2012

21 Neal Wolf & Associates, LLC

22 By: /s/ Neal L. Wolf

23 Neal L. Wolf

24 *Attorney for Defendants Jean-Claude Guez, Michele*
25 *Liberato, Yves Derville, Philippe Gire, Michel*
26 *Roujansky, Michel Saunier, and Patrice Vinet*

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Dated: June 22, 2012

Schnader Harrison Segal & Lewis LLP

By: /s/ T. Scott Tate
T. Scott Tate

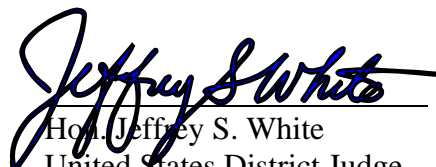
*Attorneys for Plaintiff
United States Small Business Administration in Its
Capacity as Receiver for Rocket Ventures II
SBIC, L.P.*

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

~~Proposed~~ ORDER

Pursuant to stipulation, IT IS SO ORDERED:

Dated: June 26, 2012



Hon. Jeffrey S. White
United States District Judge
Northern District of California