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13 Attorneys for Plaintiff
 14 COUNTY OF MARIN

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17 COUNTY OF MARIN,

18 Plaintiff,

19 v.

21 DELOITTE CONSULTING LLP, SAP
 22 AMERICA, INC., SAP PUBLIC SERVICES,
 INC. and ERNEST W. CULVER,

23 Defendants.
 24

No. CV11-0381-SI

**STIPULATION AND [PROPOSED]
 ORDER (1) EXTENDING PLAINTIFF'S
 TIME TO FILE AN AMENDED
 COMPLAINT; (2) DEFENDANTS' TIME
 TO MOVE AGAINST, ANSWER OR
 OTHERWISE RESPOND TO THE
 AMENDED COMPLAINT; AND (3)
 CONTINUING CASE MANAGEMENT
 CONFERENCE**

Judge: Honorable Susan Illston
 Courtroom: 10, 19th Floor

1 WHEREAS the County of Marin (the "County") filed the above-captioned action on
2 December 16, 2010 in the Superior Court of the State of California in and for the County of
3 Marin, as case number CIV1006574;

4 WHEREAS defendants removed this action to this Court on January 26, 2011;

5 WHEREAS defendant SAP America, Inc. and defendant SAP Public Services, Inc.
6 (together, the "SAP Defendants") moved to dismiss and strike portions of the County's complaint
7 on February 23, 2011;

8 WHEREAS defendant Ernest W. Culver ("Culver") moved to dismiss and strike portions
9 of the County's complaint on March 4, 2011.

10 WHEREAS pursuant to Rule 15(a)(1) of the Federal Rules of Civil Procedure, the
11 County's time to amend the complaint as a matter of course expires 21 days after service of a
12 motion under Rule 12(b), or March 16, 2011;

13 WHEREAS pursuant to the Clerk's Notice in this matter (Dkt. No. 35) the initial case
14 management conference is scheduled for April 22, 2011, at 2:30 p.m.

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
16 undersigned counsel as follows:

17 The County's time to file an amended complaint is extended to and including April 6,
18 2011;

19 The SAP Defendants' and defendant Culver's time to move against, answer or otherwise
20 respond to the County's amended complaint is extended to and including May 20, 2011; and

21 The initial case management conference in this matter is continued ninety (90) days, to
22 July ~~22~~, 2011, at 2:30 p.m.

23 29

IT IS SO STIPULATED

24
25
26 Dated: March 16, 2011

By: /s/ Mark P. Ressler

Mark P. Ressler

Kasowitz, Benson, Torres & Friedman LLP

Attorneys for Plaintiff County of Marin

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Dated: March 16, 2011

By: _____
Stephen H. Sutro
Duane Morris LLP
*Attorneys for Defendants SAP America, Inc. and
SAP Public Services, Inc.*

Dated: March 16, 2011

By: _____
Thomas B. Mayhew
Farella Braun + Martel LLP
Attorneys for Defendant Ernest W. Culver

Dated: March 16, 2011

By: _____
Geoffrey T. Holtz
Bingham McCutchen LLP
Attorneys for Defendant Deloitte Consulting LLP

Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

PURSUANT TO THE STIPULATION, AND GOOD CAUSE APPEARING
THEREFORE, IT IS SO ORDERED.

The pending motions are vacated



Hon. Susan Illston