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14 Attorneys for Defendants
 15 MIKI BOUTIQUE, INC., a dissolved California
 16 Corporation; MEI NG, an individual, individually
 17 and jointly, d/b/a YUKI BOUTIQUE

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

20 TIFFANY (NJ), LLC, a Delaware limited liability company,
 21 Plaintiff,
 22 v.
 23 MIKI BOUTIQUE, INC., a dissolved California corporation, and MEI NG, an individual, individually and jointly, d/b/a YUKI BOUTIQUE and DOES 1-10,
 24 Defendants.

Case No. CV 11-1563 MMC

THIRD STIPULATION TO EXTEND TIME TO RESPOND TO VERIFIED COMPLAINT; ~~[PROPOSED]~~ ORDER

Complaint filed: March 31, 2011

25 Pursuant to Local Rule 6.1(a), Plaintiff Tiffany (NJ), LLC, a Delaware limited liability company (the “Plaintiff”), and Defendants, Miki Boutique, Inc. a dissolved California corporation, and Mei Ng, an individual, individually and jointly, d/b/a Yuki Boutique (collectively the “Defendants”), by and through their respective counsel, hereby stipulate to a thirty (30) day

1 extension of time, up to and including July 11, 2011, for the Defendants to respond to Plaintiff's
2 Verified Complaint filed on March 31, 2011.

3
4 **RECITALS**

5 1. On March 31, 2011, Plaintiff filed its Verified Complaint alleging trademark
6 infringement and counterfeiting, and false designation of origin against the Defendants (e-docket
7 1).

8 2. Defendants were each served with their respective Summons and the Verified
9 Complaint on April 5, 2011 (Miki Boutique) (e-docket 23), and April 8, 2011 (Ng) (e-docket 24).
10 The parties previously stipulated that the Defendants' response to the Verified Complaint was due
11 on May 10, 2011 (e-docket 30), which stipulation the Court approved (e-docket 31). To allow for
12 settlement discussions to continue, the parties further stipulated that the Defendants' response to
13 the Verified Complaint is currently due on or before June 10, 2011, which the Court approved (e-
14 dockets 33, 34).

15 3. The parties' settlement discussions are still ongoing.

16 4. The parties have recently notified Defendants' insurance carrier of this action, and
17 are currently awaiting a response from the insurance carrier regarding defense coverage.
18 Accordingly, in order to allow (i) the insurance carrier an opportunity to review the notification
19 submitted in this matter, and make a determination regarding defense coverage and (ii) the
20 appearance of any additional counsel in connection with that coverage, Plaintiff and Defendants
21 have stipulated and agreed that a response to the Verified Complaint by Defendants shall be due no
22 later than July 11, 2011.

23 5. This is the third request for an extension of time of the deadline for the Defendants
24 to respond to the Verified Complaint, and the parties represent the request for additional time will
25 not alter any deadline already fixed by the Court nor prejudice either party in this matter.
26
27
28

1 **STIPULATION**

2 Pursuant to Local Rule 6.1(a), the parties hereby stipulate, through their respective counsel,
3 that Defendants shall answer or otherwise respond to Plaintiff's Verified Complaint on or before
4 July 11, 2011.
5

6 DATED: June 7, 2011

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP.

7
8 _____/S/_____
Anne E. Kearns
9 Attorneys for Plaintiff


10 DATED: June 7, 2011

LAW OFFICES OF EDWIN PRATHER

11
12 _____/S/_____
Edwin K. Prather
13 Attorneys for Defendants

14 IT IS SO ORDERED

15
16 Date: June 8, 2011

17 
18 _____
MAXINE M. CHESNEY
19 UNITED STATES DISTRICT JUDGE

20 **DECLARATION PURSUANT TO GENERAL ORDER 45, §X.B**

21 I, Anne E. Kearns, hereby declare pursuant to General Order 45, §X.B, that I have obtained
22 the concurrence in the filing of this document from the other signatory listed above.

23 I declare under penalty of perjury that the foregoing declaration is true and correct.

24 Executed on June 7, 2011, in the City of San Francisco, California.

25 KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP.

26 _____/S/_____
Anne E. Kearns
27 Attorneys for Plaintiff