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19 Attorneys for Defendant

20 DAVID GOLDSTEEN

21 UNITED STATES DISTRICT COURT

22 NORTHERN DISTRICT OF CALIFORNIA

23 SAN FRANCISCO DIVISION

24 SUZANNE D. JACKSON,

25 Plaintiff,

26 v.

27 WILLIAM FISCHER; JON SABES;
28 STEVEN SABES; DAVID GOLDSTEEN;
MARVIN SIEGEL; BRIAN CAMPION;
LONNIE BROOKBINDER; CHETAN
N ORBIT, LLC ; SPECIGEN, INC. ; PEER
DREAMS INC.; NOTEBOOKZ INC.;
ILEONARDO.COM INC.; NEW MOON LLC;
MONVIA LLC; and SAZANI BEACH
HOTEL,

Defendants.

Case No. 3:11-cv-02753-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT;
DECLARATION OF SAMUEL R.
HELLFELD IN SUPPORT**

1 Plaintiff Suzanne Jackson and Defendant David Goldsteen, by and through their counsel, and
2 subject to the Court's approval, stipulate as follows:

3 WHEREAS, Plaintiff served her complaint on Defendant Goldsteen on August 27, 2011;

4 WHEREAS, on September 15, 2011, Plaintiff and Defendant Goldsteen filed a Stipulation to
5 extend the time to answer or otherwise respond to the complaint to October 11, 2011, which was
6 entered by the Court on September 16, 2011 (Dkt. No. 24).
7

8 WHEREAS, Plaintiff and Defendant Goldsteen have agreed to a further, one-week extension
9 of time to answer or otherwise respond to the complaint on October 18, 2011 in order to afford
10 counsel for both parties the opportunity to continue their discussions regarding the complaint and a
11 potential early resolution of this matter.
12

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN
14 THE PARTIES that, subject to the Court's approval, Defendant Goldsteen shall answer or otherwise
15 respond to the complaint on or before October 18, 2011.

16 Dated: October 10, 2011

SHEPPARD MULLIN RICHTER & HAMPTON, LLP

17 By: /s/ Robert J. Stump
18 Robert J. Stump
19 Attorney for Plaintiff Suzanne D. Jackson

20 Dated: October 10, 2011

OPPENHEIMER WOLFF & DONNELLY, LLP

21 By: /s/ Samuel R. Hellfeld
22 Samuel R. Hellfeld
23 Attorney for Defendant David Goldsteen

24 PURSUANT TO STIPULATION, IT IS SO ORDERED

25 Dated: October 12, 2011

26 Jeffrey S. White
27 The Honorable Jeffrey S. White
28