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Attorneys for Defendants,  
JON SABES, STEVEN SABES AND MARVIN  
SIEGEL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;  
STEVEN SABES; DAVID GOLDSTEEN;  
MARVIN SIEGEL; BRIAN CAMPION;  
LONNIE BROOKBINDER; CHETAN  
NARSUDE; MANI KOOLASURIYA;  
JOSHUA ROSEN; UPPER 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 GRANTING LEAVE TO EXCEED  
PAGE LIMITS ESTABLISHED BY THE  
COURT'S CIVIL STANDING ORDERS**

Plaintiff Suzanne Jackson and Defendants Jon Sabes, Steven Sabes and Marvin Siegel (collectively "Defendants"), by and through their counsel, and subject to the Court's approval, stipulate as follows:

**WHEREAS**, Plaintiff filed a First Amended Complaint ("FAC") on December 5, 2011;

**WHEREAS**, the FAC asserts purported federal securities fraud and common law

1 claims related to Plaintiffs' investments;

2           **WHEREAS**, the FAC alleges, *inter alia*, that Defendants engaged in a  
3 comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of 1934  
4 and the Securities Act of 1933 and by failing to provide and failing to disclose material facts,  
5 which purportedly constitute common law fraud;

6           **WHEREAS**, the parties agree that the FAC's scope and complexity warrant a  
7 modest increase in the page limits imposed by this Court's Civil Standing Orders for Defendants'  
8 opening brief and Plaintiff's opposition brief to Defendants' motion to dismiss, but that the page  
9 limit for Defendants' reply brief shall remain 15 pages;

10           **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY**  
11 **AND BETWEEN THE PARTIES**, subject to the Court's approval, that:

12           1. Defendants' memorandum of law in support of their motion to dismiss shall  
13 not exceed 25 pages; and

14           2. Plaintiffs memorandum of law in opposition to Defendants' motion to  
15 dismiss shall not exceed 25 pages.

16 Dated: January 6, 2011

KAUFMAN LLC

17  
18 By: /s/ Alan H. Kaufman

Alan H. Kaufman

19 Attorneys for Plaintiff Suzanne D. Jackson

20 Dated: January 6, 2011

STEIN & LUBIN LLP

21  
22 By: /s/ Tanya Herrera

Tanya Herrera

23 Attorneys for Defendants

24 Jon Sabes, Steven Sabes and Marvin Siegel

**PROPOSED ORDER**

Having reviewed the above stipulation, **IT IS HEREBY ORDERED** that the page limits for the motion to dismiss briefing in this matter shall be:

Defendants' motion to dismiss: 25 pages

Plaintiff's opposition to Defendants' motion to dismiss: 25 pages

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

Dated: January 11, 2012

  
The Honorable Jeffrey S. White  
United States District Judge

By: CHIEF JUDGE JAMES WARE