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14 SIEGEL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 SUZANNE D. JACKSON,
14 Plaintiff,
15 v.
16 WILLIAM FISCHER; JON SABES;
17 STEVEN SABES; DAVID GOLDSTEEN;
18 MARVIN SIEGEL; BRIAN CAMPION;
19 LONNIE BROOKBINDER; CHETAN
NARSUDE; MANI KOOLASURIYA;
20 JOSHUA ROSEN; UPPER ORBIT, LLC;
SPECIGEN, INC.; PEER DREAMS INC.;
NOTEBOOKZ INC.; ILEONARDO.COM
INC.; NEW MOON LLC; MONVIA LLC;
21 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**

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

28 **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
19 Alan H. Kaufman
Attorneys for Plaintiff Suzanne D. Jackson

20 Dated: January 6, 2011

STEIN & LUBIN LLP

21
22 By: /s/ Tanya Herrera
23 Tanya Herrera
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