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7 Attorneys for the Sonoma County
Fair and Exposition, Inc.
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 PNC EQUIPMENT FINANCE, LLC, a Delaware
limited liability company, as successor to
13 NATIONAL CITY COMMERCIAL CAPITAL
CORPORATION,

14 Plaintiff,

15 v.

16 CALIFORNIA FAIRS FINANCING AUTHORITY,
17 et al.,

18 Defendants.
19 _____/

No. CV-11-3768 JSC

**STIPULATION TO EXTEND SONOMA
COUNTY FAIR AND EXPOSITION,
INC.'S TIME TO RESPOND TO THE
COMPLAINT; [PROPOSED] ORDER**

20 This joint stipulation and request for entry of order is entered into by and between Plaintiff
21 PNC Equipment Finance, LLC, a Delaware limited liability company, as successor to National City
22 Commercial Capital Corporation ("Plaintiff"), and Defendant the Sonoma County Fair and
23 Exposition, Inc., a non-profit corporation organized and existing under the laws of the State of
24 California ("Sonoma County Fair"). This stipulation and concomitant request for order is made to
25 provide the Sonoma County Fair with additional time in which to respond to the Complaint through
26 September 21, 2011, which will not affect any other dates scheduled by this Court. The terms and
27 provisions of this stipulation and request for order are set forth below.
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B. To provide the Sonoma County Fair and its counsel with sufficient time to review and consider the allegations set forth in the Complaint, counsel for Plaintiff has consented to extend the time for the Sonoma County Fair to respond to the Complaint through September 21, 2011.

D. Submission of this stipulation to the Magistrate Judge does not constitute consent on the part of either party to the Magistrate Judge hearing and deciding all matters with respect to this action.

WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order as follows:

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1. The time in which Defendant the Sonoma County Fair and Exposition, Inc. may file and serve its response to the Complaint is requested to be extended through September 21, 2011.

2. Submission of this stipulation to the Magistrate Judge does not constitute consent on the part of either party to the Magistrate Judge hearing and deciding all matters with respect to this action.

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1 3 This stipulation does not prevent or preclude the parties from seeking additional relief
2 from this Court, to amend this stipulation and order or otherwise.

3 Respectfully submitted,

4 Dated: August 29, 2011

Bruce D. Goldstein, County Counsel

5 By: /s/ Anne L. Keck
6 Anne L. Keck, Deputy County Counsel
7 Attorneys for Defendant the Sonoma County
8 Fair and Exposition, Inc.

9 Dated: August 29, 2011

Levy, Small & Lallas

10 By: /s/ Leo D. Plotkin
11 Leo D. Plotkin
12 Attorneys for Plaintiff

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14 **[PROPOSED] ORDER**

15 Pursuant to the foregoing stipulation, and with good cause appearing,

16 IT IS HEREBY ORDERED that Defendant the Sonoma County Fair and Exposition, Inc. may
17 file and serve its response to the Complaint through and including September 21, 2011.

18 Date: August 30, 2011

19 *Jacqueline S. Corley*
20 HONORABLE JACQUELINE S. CORLEY
21 United States Magistrate Judge
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ELECTRONIC CASE FILING ATTESTATION

I, Anne L. Keck, am the ECF User whose identification and password are being used to file this **STIPULATION TO EXTEND SONOMA COUNTY FAIR AND EXPOSITION, INC.’S TIME TO RESPOND TO THE COMPLAINT; [PROPOSED] ORDER** on behalf of Plaintiff and Defendant the Sonoma County Fair and Exposition, Inc. pursuant to Civil Local Rule 7-11. In compliance with General Order No. 45(X)(B), I hereby attest that the concurrence in the filing of this document has been obtained from its signatories.

Dated: August 29, 2011

Sonoma County Counsel

By: /s/ Anne L. Keck
Anne L. Keck
Deputy County Counsel