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**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANGELA CASANAVE,

Plaintiff,

v.

C.R. BARD, INC., DAVOL, INC.; and W.
L. GORE ASSOCIATES, INC.,

Defendant.

CASE NO. 3:11-cv-05308-RS

**JOINT STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANT'S MOTION TO
DISMISS**

9 COME NOW Plaintiff Angela Casanave and Defendant W. L. Gore Associates, Inc.
10 ("Gore") and hereby jointly stipulate and agree that the time for Plaintiff to respond to Defendant
11 Gore's Motion to Dismiss shall be extended until and through March 30, 2012, with Defendant's
12 reply brief deadline extended until and through April 6, 2012.

13 1. Defendant filed its Motion to Dismiss Plaintiff's First Amended Complaint on March 2,
14 2012. Plaintiff has sent a proposed Second Amended Complaint to Defendant, which removes
15 certain causes of action as well as additional facts. Plaintiff sent the proposed Second Amended
16 Complaint to defense counsel on March 14. Defense counsel has agreed to present the proposed
17 Second Amended Complaint to Defendant. However, unbeknownst to Plaintiff's counsel,
18 Defendant's representatives are entirely unavailable until this week beginning on March 19.

19 2. The parties wish for Plaintiff's time to respond to be extended so that Defendant may
20 have more time to review Plaintiff's proposed Second Amended Complaint and so that the
21 parties will have adequate time to meet and confer on any of Defendant's remaining concerns
22 regarding Plaintiff's pleadings. This extension will not affect the hearing date for Defendant's
23 Motion to Dismiss, currently scheduled for April 19, 2012. Neither party has previously
24 requested an extension of deadlines in this case.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED

26 DATE: 3/20/12

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28 UNITED STATES DISTRICT JUDGE