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Attorneys for Defendant PHD Media L.L.C.

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

JEROME DAMASCO, individually and on
 behalf of a class of similarly situated
 individuals,

Plaintiff,

v.

PHD MEDIA L.L.C., a Delaware limited
 liability company,

Defendant.

) Case No. 5:11-cv-05353-RS

)
) **STIPULATION AND**
) **[PROPOSED] ORDER**
) **EXTENDING TIME FOR**
) **DEFENDANT PHD MEDIA**
) **L.L.C. TO RESPOND TO**
) **COMPLAINT**

)
) Hon. Richard Seeborg
) Action Filed: November 3, 2011

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)
)

WHEREAS, on November 4, 2011 Plaintiff filed his Class Action Complaint
 (“Complaint”) and Defendant was served with the Complaint on November 16, 2011;

WHEREAS, on December 8, 2011, the parties filed a joint stipulation to extend
 Defendant’s responsive pleading deadline to January 9, 2012 (Dkt. 9);

STIPULATION AND PROPOSED ORDER RE: EXTENSION OF TIME TO RESPOND

1 WHEREAS, the parties also filed joint stipulations to extend Defendant's responsive
2 pleading deadline on January 13, 2012 (Dkt. 11) and January 30, 2012 (Dkt. 14), and on
3 February 15, 2012, the parties filed a further joint stipulation to extend Defendant's
4 responsive pleading deadline to February 29, 2012 (Dkt. 15);

5 WHEREAS, the parties have had multiple conversations relating to case settlement,
6 wish to continue those settlement conversations, and have circulated a draft settlement
7 agreement for review; and

8 WHEREAS, in the interest of maximizing efficiency and to permit the parties to
9 continue to focus on resolving this matter, Defendant seeks additional time to file a
10 responsive pleading;

11 WHEREAS, Defendant does not seek an extension for the purpose of unnecessarily
12 delaying this action or for any other improper purpose;

13 WHEREAS, an extension of time would not alter the date of any event or deadline
14 already fixed by the Court; and

15 WHEREAS, Plaintiff has no objection to Defendant receiving additional time to
16 respond to the Complaint.

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28 **STIPULATION AND PROPOSED ORDER RE: EXTENSION OF TIME TO RESPOND**

1 THEREFORE, IT IS STIPULATED by the Parties hereto, through their attorneys,
2 pursuant to Civil L.R. 6-1 and 7-12 that the deadline for Defendant to answer, move, or
3 otherwise respond to the Complaint shall be extended to March 14, 2012.

4 IT IS SO STIPULATED.

5 Dated: February 29, 2012

By: 

Sean P. Reis
EDELSON MCGUIRE, LLP
Attorneys for JEROME DAMASCO,
individually and on behalf of a class of
similarly situated individuals

10 Dated: February 29, 2012

By: 

Marc Rachman
DAVIS & GILBERT LLP
Attorneys for Defendant
PHD MEDIA L.L.C.

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

18 DATED: 3/1/12


Honorable Richard Seeborg
U.S. District Court Judge