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17 Attorneys for Plaintiff
 18 TODD BURTON

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**

21 TODD BURTON, on behalf of himself and all
 others similarly situated,

22 Plaintiff,

23 v.

24 TIME WARNER CABLE, INC.,

25 Defendant.

CASE NO. 3:12-cv-02828-JCS

**JOINT STIPULATION EXTENDING
 TIME FOR DEFENDANT TIME
 WARNER CABLE INC. TO RESPOND
 TO COMPLAINT**

26 Complaint Filed: June 1, 2012
 27 Trial Date: None Set

1 Pursuant to Local Rule 6-1(a), Plaintiff Todd Burton, on behalf of himself and all others
2 similarly situated ("Plaintiff"), and Defendant Time Warner Cable Inc. ("Defendant")
3 (collectively referred to herein as the "Parties"), by and through their respective counsel of
4 record, hereby stipulate to extend Defendant's time to respond to the Complaint.

5 WHEREAS, on June 1, 2012, Plaintiff filed a putative class action Complaint against
6 Defendant, alleging violations of the Cable Communications Policy Act, 47 U.S.C. § 551, *et seq.*,
7 the California Consumer Records Act, Cal. Civ. Code § 1798.80, *et seq.*, and California Penal
8 Code § 637.5, and breach of implied contract.

9 WHEREAS, Defendant accepted service of the Complaint on June 5, 2012.

10 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), Defendant's
11 response to the Complaint is due on June 26, 2012.

12 WHEREAS, Defendant requires additional time to respond to the Complaint.

13 WHEREAS, this extension is not sought for the purpose of unnecessary delay.

14 WHEREAS, Plaintiff has agreed to a 30-day extension of Defendant's time to respond to
15 the Complaint.

16 WHEREAS, the extension of time sought will not alter the date of any event or deadline
17 already fixed by Court order.

18 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE the time for
19 Defendant to respond to the Complaint in this action shall be extended to July 26, 2012.

20 Dated: June 11, 2012

WHITE & CASE LLP

21 By: /s/ Bryan A. Merryman

22 Bryan A. Merryman
23 Attorneys for Defendant
Time Warner Cable Inc.

24 Dated: June 11, 2012

SIPRUT PC

25 By: /s/ Todd C. Atkins

26 Todd C. Atkins
27 Attorneys for Plaintiff
Todd Burton

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DECLARATION OF BRYAN A. MERRYMAN

I, Bryan A. Merryman, am an attorney of record for Defendant Time Warner Cable Inc. Todd C. Atkins, attorney of record for Plaintiff Todd Burton, gave me his concurrence in the filing of the document titled "JOINT STIPULATION EXTENDING TIME FOR DEFENDANT TIME WARNER CABLE INC. TO RESPOND TO COMPLAINT," which concurrence shall serve in lieu of his signature on that filed document. I have obtained and will maintain records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request by a party until one year after final resolution of the action (including appeal, if any).

Dated: June 11, 2012

WHITE & CASE LLP

By: /s/ Bryan A. Merryman

Bryan A. Merryman
Attorneys for Defendant
Time Warner Cable Inc.

Dated: June 12, 2012

