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8 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10 SCOTT BRUCE, Individually and on Behalf of  
All Others Similarly Situated,

11 Plaintiff,

12 v.

13 SUNTECH POWER HOLDINGS CO., LTD.  
and ZHENGRONG SHI,

14 Defendants.  
15

Case No. 3:12-cv-04061-RS

**STIPULATION AND [~~PROPOSED~~]  
ORDER TO EXTEND DEFENDANT  
ZHENGRONG SHI'S TIME TO  
ANSWER THE CONSOLIDATED  
SECOND AMENDED CLASS ACTION  
COMPLAINT**

Judge: Hon. Richard Seeborg

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1 Pursuant to Civil Local Rules 6-2 and 7-12, lead plaintiffs James Bachesta, Thanh Le, and  
2 Chen Weifeng (collectively, the “Lead Plaintiffs”) and defendant Zhengrong Shi (together with  
3 the Lead Plaintiffs, the “Parties”), by and through their counsel, hereby agree and stipulate that  
4 good cause exists to request an order from the Court extending Dr. Shi’s time to answer the  
5 Consolidated Second Amended Class Action Complaint (the “SAC”) from the current deadline of  
6 September 2, 2014.

7 WHEREAS, on August 12, 2014, the Court issued an Order (Dkt. No. 119) denying Dr.  
8 Shi’s Motion to Dismiss the SAC and ordering Dr. Shi to “file an answer to the SAC within  
9 twenty days”;

10 WHEREAS, because the twenty-day period ends on Labor Day, Dr. Shi must file an  
11 answer to the SAC on or before September 2, 2014;

12 WHEREAS counsel for Dr. Shi require more time to consult with Dr. Shi and prepare the  
13 answer than the current schedule allows;

14 WHEREAS counsel for Dr. Shi have previously scheduled family vacations that limit their  
15 ability to prepare the answer under the current schedule; and

16 WHEREAS the proposed deadline of September 30, 2014 would ensure that the answer is  
17 filed before the Case Management Conference that the Court has scheduled for October 2, 2014.

18 Accordingly, IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their  
19 undersigned counsel, subject to Court approval, as follows:

- 20 1. Dr. Shi’s time to answer the SAC is hereby extended to September 30, 2014.
- 21 2. Nothing in this Stipulation shall be construed as a waiver of any of Dr. Shi’s rights  
22 in law or equity, or as a waiver of any defenses that he would otherwise have.
- 23 3. There have been no previous modifications to the schedule that the Court set in its  
24 August 12, 2014 Order for Dr. Shi to answer the SAC.
- 25 4. The Parties do not seek to extend Dr. Shi’s time to answer the SAC for the purpose  
26 of delay, and the proposed new date will not have an effect on any pre-trial or trial dates because  
27 the Court has yet to schedule these dates.

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Dated: August 22, 2014

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Dated: August 22, 2014

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

DATED: August 22, 2014



Hon. Richard Seeborg  
United States District Judge