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8 Attorneys for Defendants,
 9 NATIONAL MEDIA CONNECTION, LLC, NATIONAL
 10 MORTGAGE HELP CENTER, LLC, AND MATTHEW
 11 S. GOLDREICH

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

15 NEIGHBORHOOD ASSISTANCE
 16 CORPORATION OF AMERICA, a
 17 Massachusetts corporation,

18 Plaintiff,

19 v.

20 NATIONAL MEDIA CONNECTION,
 21 LLC, a Connecticut limited liability
 22 company, THE NATIONAL
 23 MORTGAGE HELP CENTER, LLC, a
 24 Connecticut limited liability company, and
 25 MATTHEW S. GOLDREICH, an
 26 individual,

27 Defendants.

Case No.: CV-13-01698-CRB

Hon. Judge Charles R. Breyer

**STIPULATION RE RESPONSE
 DEADLINE AND ORDER**

Date Complaint Filed: 4/15/13

1 Plaintiff Neighborhood Assistance Corporation of America (“Plaintiff”) and
2 Defendants National Media Connection, LLC, National Mortgage Help Center, LLC,
3 and Matthew S. Goldreich (“Defendants”) hereby stipulate and agree as follows:

4 **STIPULATION**

5 WHEREAS Plaintiff filed its Complaint against Defendants on April 15, 2013;

6 WHEREAS the parties previously stipulated and agreed that each Defendant
7 was served with the Summons and Complaint and that such service was deemed to
8 have occurred on May 1, 2013;

9 WHEREAS the parties previously agreed that Defendants’ response to the
10 Complaint would be due on May 28, 2013; and

11 WHEREAS the parties are now engaged in settlement discussions which may
12 result in a complete resolution of this entire litigation, and now wish to avoid the time
13 and expense of litigating this action while such settlement discussions are ongoing;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
15 between the parties hereto and their respective undersigned attorneys as follows:

16 1. The last day for Defendants to file a responsive pleading to the
17 Complaint is extended from May 28, 2013 to June 18, 2013; and

18 2. By entering into this Stipulation Defendants do not waive any challenges
19 they may wish to make to the jurisdiction and/or venue of this Court, should this
20 matter not settle.

21
22
23 Dated: May 24, 2013

FOX ROTHSCHILD LLP

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25 By: /James E. Doroshow/

James E. Doroshow
Attorneys for Defendants,
NATIONAL MEDIA CONNECTION, LLC,
NATIONAL MORTGAGE HELP CENTER, LLC,
AND MATTHEW S. GOLDREICH

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Dated: May 24, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

By: /Christopher J. McNamara/
Christopher J. McNamara
Attorneys for Plaintiff,
NEIGHBORHOOD ASSISTANCE
CORPORATION OF AMERICA

SO ORDERED:

Dated: May 29, 2013

