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7 Attorneys for Plaintiff  
 Neighborhood Assistance Corporation of America  
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9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**  
 11 **SAN FRANCISCO DIVISION**

12 NEIGHBORHOOD ASSISTANCE  
 CORPORATION OF AMERICA, a Massachusetts  
 13 corporation,

14 Plaintiff,

15 v.

16 NATIONAL MEDIA CONNECTION, LLC, a  
 Connecticut limited liability company, THE  
 17 NATIONAL MORTGAGE HELP CENTER,  
 LLC, a Connecticut limited liability company, and  
 18 MATTHEW S. GOLDREICH, an individual,

19 Defendants.  
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Case No. CV-13-1698-CRB

**STIPULATION TO CONTINUE  
 RESPONSE DEADLINE AND CASE  
 MANAGEMENT CONFERENCE AND  
 ORDER**

Hon. Charles R. Breyer

Complaint filed: April 15, 2013

21  
 22 Plaintiff Neighborhood Assistance Corporation of America (“Plaintiff”) and Defendants  
 23 National Media Connection LLC, The National Mortgage Help Center LLC and Matthew S.  
 24 Goldreich (“Defendants”) hereby stipulate and agree as follows:

25 **STIPULATION**

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

27 WHEREAS the parties previously stipulated and agreed that each Defendant was served  
 28 with the Summons and Complaint and that such service was deemed to have occurred on May 1,

1 2013;

2 WHEREAS the parties previously agreed that Defendants' response to the Complaint  
3 would be due on August 15, 2013; and

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

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

- 9 1. The last day for Defendants to file a responsive pleading to the Complaint is extended to  
10 September 6, 2013;
- 11 2. By entering into this Stipulation Defendants do not waive any challenges they may wish to  
12 make to the jurisdiction and/or venue of this Court, should this matter not settle; and
- 13 3. The Case Management Conference presently scheduled for August 30, 2013 at 8:30 a.m.  
14 will be continued until October 11, 2013 at 8:30 a.m., and all deadlines tied to the Case  
15 Management Conference date shall be keyed to the new date.

16  
17 DATED: August 23, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

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19 By: /S/ Christopher J. McNamara  
Christopher J. McNamara

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21 Attorneys for Plaintiff  
Neighborhood Assistance Corporation of America

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23 DATED: August 23, 2013

FOX ROTHSCHILD LLP

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25 By: /S/ James E. Doroshow  
James E. Doroshow

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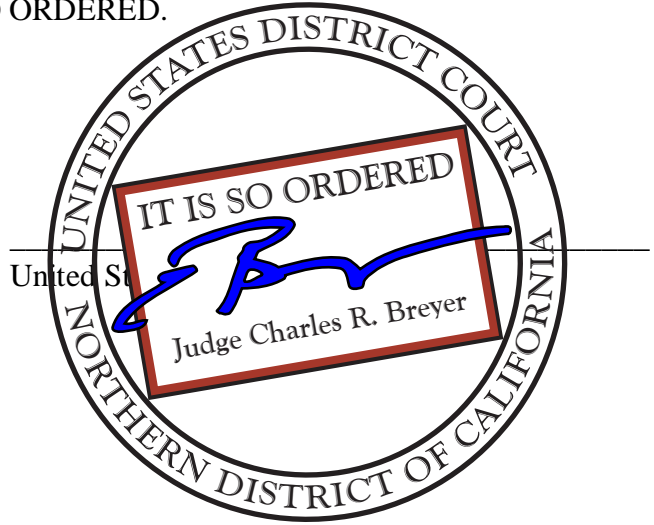
27 Attorneys for Defendants  
National Media Connection, LLC, National Mortgage Help  
Center, LLC and Matthew S. Goldreich

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

August 27, 2013



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