

1 WILLIAM H. KIMBALL (Cal. Bar No. 242626)
2 LAW OFFICE OF WILLIAM H. KIMBALL
3 803 Hearst Avenue
4 Berkeley, CA 94710
5 Telephone: (510) 704-1400
6 Facsimile: (510) 649-5050
7 whkimball@whkimball.com

8 Attorney for Defendant Ammar Akbari

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SECURITIES AND EXCHANGE COMMISSION,

Case No. 3:14-CV-02743-EMC

13 Plaintiff,

14 v.

15 SALEEM KHAN, AMMAR AKBARI,
16 ROSHANLAL CHAGANLAL and RANJAN
MENDONSA

17 Defendants,

18 and

19 SHAHID KHAN and MICHAEL KOZA,

20 Relief Defendants.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE TIME FOR
DEFENDANTS AKBARI AND KHAN
TO ANSWER THE COMPLAINT**

21
22 WHEREAS, on June 13, 2014, the U.S. Securities and Exchange Commission (the
23 “Commission”) filed the Complaint against Defendants Saleem Khan, Ammar Akbari, Roshanlal
24 Chaganlal and Ranjan Mendonsa (collectively, the “Defendants”), and the Commission has since
25 filed proof of service, or waiver of service, with respect to all of the Defendants;

26 WHEREAS, pursuant to prior Stipulation and Order, each of the Defendants is currently
27 required to file an Answer to the Complaint on or before October 14, 2014; this date has been
28 previously extended by stipulation of the parties and order of the Court;

1 WHEREAS, pursuant to prior Stipulation and Order, the parties shall file a joint Case
2 Management Statement by November 26, 2014 in advance of the Case Mangement Conference
3 scheduled for December 4, 2014 at 9:30 a.m.; this date was also previously extended by stipulation of
4 the parties and order of the Court;

5 WHEREAS, counsel for the Commission and counsel for Defendants Akbari and Khan have
6 been speaking to determine whether there may be any opportunity for an early resolution of this
7 matter and have agreed to an extension of approximately 30 days for Defendants Akbari and Khan to
8 answer the Complaint;

9 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties that
10 Defendants Akbari and Khan shall file their respective Answers to the Complaint on or before
11 November 14, 2014.

12 IT IS SO STIPULATED.

13 DATED: October 14, 2014

14 /s/
15 SECURITIES AND EXCHANGE
16 COMMISSION
17 Susan F. LaMarca (SBN 215231)
18 Aaron Arnzen (SBN 218272)
19 Victor W. Hong (SBN 165938)
20 44 Montgomery Street, Suite 2800
21 San Francisco, CA 94104
22 Telephone: 415-705-2500
23 Attorneys for Plaintiff

24 /s/
25 LAW OFFICE OF WILLIAM H. KIMBALL
26 William H. Kimball (SBN 242626)
27 803 Hearst Avenue
28 Berkeley, CA 94710
Attorney for Defendant Ammar Akbar

/s/
SUGARMAN & CANNON
Christopher Cannon (SBN 88034)
180 Montgomery Street Suite 2350
San Francisco, CA 94104
Attorneys for Defendant Saleem Khan

1 **[PROPOSED] ORDER**

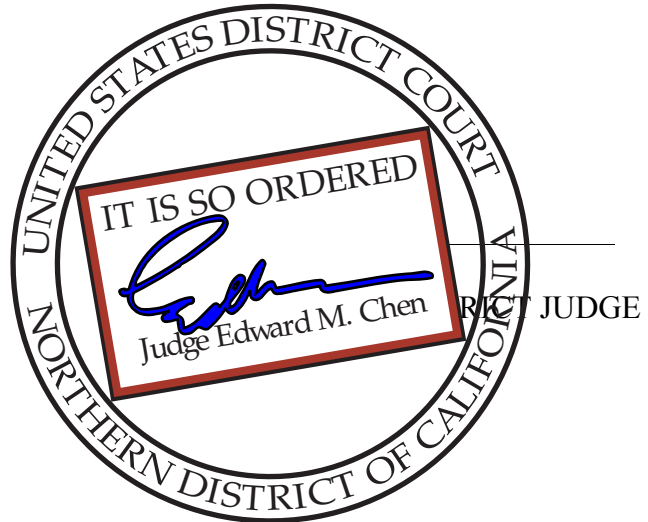
2 Good cause appearing from the above Stipulation, the requested extension of approximately
3 30 days for Defendants Akbari and Khan to file an Answer to the Complaint, is hereby GRANTED.

4
5 IT IS HEREBY ORDERED THAT:

6 The respective Answers to the Complaint of Defendant Akbari and Defendant Khan are each
7 due to be filed on or before November 14, 2014.

8
9 IT IS SO ORDERED.

10
11
12
13
14 DATED: 10/17/14



1 ATTESTATION

2 I, William H. Kimball, am the ECF User whose identification and password are being used to
3 file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their
4 representatives concurs in this filing.

5
6
7 Dated: October 14, 2014

/s/
William H. Kimball
Attorney for Defendant Ammar Akbari

CERTIFICATE OF SERVICE

I, William H. Kimball, am a citizen of the United States, over 18 years of age and not a party to this action. On October 14, 2014, I served the following documents:

- STIPULATION AND [PROPOSED] ORDER TO EXTEND THE TIME FOR DEFENDANTS AKBARI AND KHAN TO ANSWER THE COMPLAINT

Via e-mail and U.S. Mail, postage pre-paid, to the following:

Roshanlal Chaganlal, Pro Se
4883 Thorndike Lane,
Dublin, CA 94568
rchaganlal@gmail.com

Via the Court’s CM/ECF system to the following:

Christopher Cannon, Esq.
Sugarman & Cannon
180 Montgomery Street, Suite 2350
San Francisco, CA 94104
Attorney for Defendant Saleem Khan

Charlene S. Shimada, Esq.
Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Attorney for Defendant Ranjan Mendonsa

Susan F. LaMarca
Securities and Exchange Commission
44 Montgomery Street, Suite 2800
San Francisco, CA 94104
Attorney for Plaintiff Securities and Exchange Commission

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California on October 14, 2014.

/s/
William H. Kimball