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10 Attorneys for Defendant  
 AT&T MOBILITY LLC

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 12 **UNITED STATES DISTRICT COURT**  
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 San Francisco Division

14  
 15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 v.

18 AT&T MOBILITY LLC, a limited liability  
 company,

19 Defendant.  
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 21  
 22  
 23

Case No. 14-CV-04785-EMC

**STIPULATED REQUEST AND PROPOSED  
 ORDER FOR EXTENSION OF FILING  
 DEADLINES FOR MOTION TO DISMISS,  
 OPPOSITION TO MOTION TO DISMISS,  
 AND REPLY IN SUPPORT OF MOTION  
 TO DISMISS, AND FOR SCHEDULING OF  
 HEARING AND INITIAL CASE  
 MANAGEMENT CONFERENCE**

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 25 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, defendant AT&T Mobility LLC  
 26 (“AT&T”) and plaintiff Federal Trade Commission (“FTC”) (collectively, the “Parties”) hereby  
 27 stipulate to an extension of the filing deadline governing AT&T’s motion to dismiss, and hereby  
 28

1 file a stipulated request for a court order: (1) extending the deadlines governing (i) the FTC's  
 2 opposition to AT&T's motion to dismiss and (ii) AT&T's reply in support of its motion to  
 3 dismiss; and (2) scheduling an initial case management conference and a hearing on AT&T's  
 4 motion to dismiss. The Parties require additional time to investigate all relevant issues and to  
 5 submit their filings to the Court. The requested modifications will not affect the schedule for the  
 6 case. The Parties therefore stipulate to the following schedule:

<u>Filing</u>	<u>Scheduled Due Date</u>	<u>Stipulated Due Date</u>
Motion To Dismiss	December 29, 2014. <i>See</i> Fed. R. Civ. P. 12(a)(1)(A)(ii).	<b>January 5, 2015</b>
Opposition to Motion To Dismiss	14 days after the motion to dismiss is filed. <i>See</i> Civil L.R. 7-3(a).	<b>February 4, 2015</b>
Reply in Support of Motion To Dismiss	7 days after the opposition is filed. <i>See</i> Civil L.R. 7-3(c).	<b>February 18, 2015</b>
<u>Proceeding</u>		<u>Stipulated Date</u>
Hearing on Motion To Dismiss		<sup>12</sup> <b>March 5, 2015</b>
Initial Case Management Conference		<sup>12</sup> <b>March 5, 2015</b>

17 Pursuant to Civil Local Rule 6-2, the reasons for the requested modification are set forth in  
 18 a supporting declaration accompanying this request.

19 Pursuant to Civil Local Rule 5-1(i), I hereby attest that I have obtained concurrence in the  
 20 filing of this document from all other signatories and that I have on file all holograph signatures  
 21 for any signatures indicated by a "conformed" signature.

22 Respectfully submitted,

23  
 24 Dated: December 11, 2014

KELLOGG, HUBER, HANSEN, TODD,  
 EVANS & FIGEL, P.L.L.C.

25 By: /s/ Michael K. Kellogg  
 26 Michael K. Kellogg

27 Attorney for Defendant  
 28 AT&T MOBILITY LLC

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Dated: December 11, 2014

DAVID C. SHONKA  
Acting General Counsel

By: /s/ Evan Rose  
Evan Rose

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

PURSUANT TO STIPULATION, IT IS SO ORDERED.

12/12/14

DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE  
NORTHERN DISTRICT OF CALIFORNIA

