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11 Attorneys for Plaintiff

12 **IN THE UNITED STATES DISTRICT COURT**  
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 14 **(SAN FRANCISCO DIVISION)**

15 MOON MOUNTAIN FARMS, LLC,  
 16 Plaintiff,  
 17 vs.  
 18 RURAL COMMUNITY INSURANCE  
 19 COMPANY,  
 20 Defendant.  
 21  
 22

Case No. 3:14-MC-80099-SC  
 Action pending in the United States  
 District Court for the District of Arizona  
 (2:13-CV-00349-SRB)

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING TIME FOR  
 PLAINTIFF TO FILE ITS REPLY  
 IN SUPPORT OF ITS MOTION TO  
 COMPEL**

Judge: Hon. Samuel Conti  
 Date: July 11, 2014  
 Time: 10:00 a.m.  
 Place: Courtroom 1, 17<sup>th</sup> Floor

23  
 24 **STIPULATION TO EXTEND TIME TO FILE REPLY**  
 25 **IN SUPPORT OF MOTION TO COMPEL**

26 Pursuant to Northern District of California Civil Local Rules 6-1(b), 6-2 and 7-  
 27 12, Plaintiff Moon Mountain Farms, LLC (“MMF”) and Non-Party Wells Fargo &  
 28

1 Company (“Wells Fargo”) (collectively the “Parties”), by and through their respective  
2 counsel, hereby stipulate to extend MMF’s Reply in Support of its Motion to Compel as  
3 follows:

4 WHEREAS, the Parties who sign this Stipulation constitute all of the parties to  
5 this proceeding;

6 WHEREAS, on April 4, 2014, MMF filed its Notice of Motion and Motion to  
7 Compel Compliance with Subpoena;

8 WHEREAS, on May 30, 2014, Wells Fargo filed its Response to MMF’s Motion  
9 to Compel Compliance with Subpoena;

10 WHEREAS, currently MMF’s Response was due Friday, June 13, 2014, and the  
11 Motion is set to be heard on July 11, 2014, at 10:00 a.m.;

12 WHEREAS, the Parties conferred on June 15th and 16th regarding MMF’s  
13 request for a brief extension of time to file its Reply in Support of its Motion to Compel;

14 WHEREAS, the Parties agree to delaying MMF’s Reply due to the unexpected  
15 death of MMF counsel’s near family member;

16 WHEREAS, the Parties agree that this extension of time will not jeopardize the  
17 disposition of the Parties’ pending motions or the dates for the close of discovery, trial  
18 date and related deadlines of the underlying action, pending in the United States District  
19 Court for the District of Arizona (2:13-cv-00349-SRB);

20 THE PARTIES DO HEREBY AGREE AND STIPULATE to the following:

21 1. Plaintiff MMF shall have until Friday, June 20, 2014, to file its Reply in  
22 Support of its Motion to Compel.

23 Dated: June 17, 2014

24 Respectfully submitted,

25 POLSINELLI PC

26 By: s/Troy B. Froderman

27 Troy B. Froderman

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Dated: June 16, 2014

Respectfully submitted,  
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: s/Raymond C. Marshall (with permission)  
Raymond C. Marshall

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 17, 2014

