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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 (SAN FRANCISCO DIVISION)

13 MOON MOUNTAIN FARMS, LLC,
 14 Plaintiff,
 15 v.
 16 RURAL COMMUNITY INSURANCE
 COMPANY,
 17 Defendant.
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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 ENLARGING TIME
 FOR BRIEFING ON PLAINTIFF’S
 MOTION TO COMPEL
 COMPLIANCE WITH SUBPOENA
 AND MOTION TO TRANSFER;
 SUPPORTING DECLARATION OF
 RAYMOND MARSHALL
 IT IS SO ORDERED AS MODIFIED
 [Northern Dist. Local Rule 6-2, 7-12]**

Judge: Hon. Samuel Conti
 Date: May 30, 2014
 Time: 10:00 a.m.
 Place: Courtroom 1. 17th Floor

STIPULATION TO EXTEND TIME TO RESPOND TO MOTIONS

Pursuant to Northern District of California Civil Local Rules 6-1(b), 6-2 and
 7-12, Plaintiff Moon Mountain Farms, LLC (“Plaintiff”) and Non-party Wells Fargo & Co.
 (“Wells Fargo”) (collectively the “Parties”), by and through their respective counsel,

1 hereby stipulate to extend the briefing schedule on Plaintiff's Motion to Compel
2 Compliance with Subpoena and Motion to Transfer (the "Motions") as follows:

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

5 WHEREAS, on April 4, 2014, Plaintiff filed its Notice of Motion and
6 Motion to Compel Compliance with Subpoena; Memorandum of Points and Authorities in
7 Support Thereof and Motion to Transfer;

8 WHEREAS, currently Wells Fargo's Response is due by May 2, 2014,
9 Plaintiffs Reply is due by May 12, 2014, and the Motions are set to be heard on May 30,
10 2014, at 10:00 AM;

11 WHEREAS, the Parties met and conferred on April 28 and April 30, 2014, to
12 eliminate or narrow the scope of the issues underlying Plaintiff's Motion to Compel;

13 WHEREAS, the Parties have reached agreement on the majority of the issues
14 underlying Plaintiff's Motion to Compel;

15 WHEREAS, the Parties agree a delay in the briefing schedule will permit
16 Plaintiff sufficient time to review Wells Fargo's production of documents, scheduled to be
17 substantially made on May 5, 2014, such that Plaintiff can determine whether any issues
18 remain in dispute;

19 WHEREAS, the Parties agree that this extension of time will not jeopardize
20 the disposition of Plaintiff's Motions or the dates for the close of discovery, trial date and
21 related deadlines of the underlying action, pending in the United States District Court for
22 the District of Arizona (2:13-cv-00349-SRB);

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

24 1. Non-party Wells Fargo shall have until Friday, May 16, 2014, to file
25 its Response to Plaintiffs Motions;

26 2. Plaintiff shall have until Friday, May 23, 2014, to file its Reply in
27 support of its Motions; and
28

June 6, 2014

1 3. The Motions shall continue to be heard on Friday, ~~May 30, 2014~~, at
2 10:00 AM in Courtroom 1 of this Court, or on the nearest date/time before or after that is
3 convenient for the Court.

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5 Dated: May 1, 2014

6 Respectfully submitted,

7 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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9 By /Raymond C. Marshall/
10 RAYMOND C. MARSHALL

11 Attorneys for Non-Party
12 WELLS FARGO & CO.

12 Dated: May 1, 2014

13 POLSINELLI PC

14
15 By /Carlyle W. Hall III/
16 CARLYLE (CARY) W. HALL III

17 Attorneys for Plaintiff
18 Moon Mountain Farms, LLC

19
20 **PROPOSED** ORDER

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22
23 DATED: May 2, 2014

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25
26 Hon. Samuel Conti
27 United States District Judge

