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5 Attorneys for Defendant  
 6 DAVID L. BORGES

7 UNITED STATES DISTRICT COURT  
 8 NORTHERN DISTRICT OF CALIFORNIA  
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10 H.P.D. CONSOLIDATION, INC. dba  
 VALLEY WINE WAREHOUSE,

11 Plaintiff,

12 v.

13 JOSE PINA aka JOSE LUIS PIEDRA, et al.

14 Defendants.  
 15 \_\_\_\_\_/

Case No. 3:15-cv-05309-EMC

STIPULATION EXTENDING TIME TO  
 RESPOND TO COMPLAINT

**Complaint Filed:** November 19, 2015  
**Trial Date:** None set

1 Plaintiff H.P.D. Consolidation, Inc. dba Valley Wine Warehouse (“PLAINTIFF”) and  
2 Defendant David L. Borges (“DEFENDANT”), by and through their respective counsel of record,  
3 hereby stipulate pursuant to Local Rule 6-1 that DEFENDANT David L. Borges shall have to and  
4 including March 25, 2016 to file a response to PLAINTIFF’s Complaint. This agreed extension of  
5 time will not alter the date of any event or deadline already fixed by Court order. This is the second  
6 stipulated extension of time requested by DEFENDANT David L. Borges in this matter. Previously,  
7 Plaintiff stipulated to an extension of time for Defendants Belmont Wine Exchange, LLC, Michael  
8 Shemali, Wines of the World, LLC, Tri Cities Liquor & Spirits, LLC, Matt Myers, Hi-Time Wine  
9 Cellars, David L. Borges and Rajiv Malhan to respond to the Complaint. *See* Docket Nos. 29, 42, 54  
10 and 66.

11 Dated: February 22, 2016

MOTSCHIEDLER, MICHAELIDES,  
WISHON, BREWER & RYAN, LLP

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13  
14 By: /s/ Russell K. Ryan  
Russell K. Ryan

15 Attorneys for Plaintiff  
16 H.P.D CONSOLIDATION, INC. dba VALLEY  
WINE WAREHOUSE

17 Dated: February 22, 2016

DUGGAN LAW CORPORATION

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19  
20 By: /s/ Jennifer E. Duggan  
Jennifer E. Duggan  
Christina M. Bucci

21 Attorneys for Defendant  
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