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10 Attorneys for Defendant
 11 KAPLAN, INC., erroneously sued as KAPLAN
 INTERNATIONAL NORTH AMERICA, LLC
 12

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15

16 KAITLIN RIDLEY, on behalf of herself
 and all others similarly situated,

17 Plaintiff,

18 v.

19 KAPLAN INTERNATIONAL NORTH
 20 AMERICA, LLC,

21 Defendant.
 22

Case No. 3:16-cv-02536-JCS

**STIPULATION TO EXTEND TIME FOR
 DEFENDANT KAPLAN, INC. TO
 RESPOND TO COMPLAINT**

1 Pursuant to Civil Local Rule 6-1(a), Defendant Kaplan, Inc. (“Defendant” or “Kaplan”)¹
2 and Plaintiff Kaitlin Ridley (“Plaintiff” or “Ridley”), by and through their respective counsel,
3 hereby stipulate as follows:

4 WHEREAS, Ridley served her Collective and Class Action Complaint (“Complaint”) on
5 June 1, 2016;

6 WHEREAS, Kaplan currently has until June 22, 2016 to answer or respond to Ridley’s
7 Complaint;

8 WHEREAS, Kaplan has requested and Ridley has consented to an additional two weeks
9 for Kaplan’s answer or response to Ridley’s Complaint;

10 WHEREAS, an additional two weeks for Kaplan’s answer or response to Ridley’s
11 Complaint will not alter the date of any event or any deadline already fixed by Court order;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
13 through their respective counsel, that Kaplan shall answer or otherwise respond to Ridley’s
14 Complaint by July 6, 2016.

15
16 Dated: June 22, 2016

DRINKER BIDDLE & REATH LLP

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18 By: /s/ Cheryl D. Orr

19 Cheryl D. Orr
20 Valerie D. Kahn
21 Phillippe A. Lebel

22 Attorneys for Defendant
23 KAPLAN, INC., erroneously sued as
24 KAPLAN INTERNATIONAL NORTH
25 AMERICA, LLC

26 _____
27 ¹ Defendant contends that Kaplan, Inc. is the properly named party and that it was
28 erroneously sued as Kaplan International North America, LLC. Plaintiff will amend the
complaint to name a different party if appropriate.

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Dated: June 22, 2016

LICHTEN & LISS-RIORDAN, PC

By: /s/ Shannon Liss-Riordan

Shannon Liss-Riordan
Thomas Fowler
Matthew D. Carlson

Attorneys for Plaintiff
KAITLIN RIDLEY

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

/s/ Cheryl D. Orr

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Dated: June 24, 2016

