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9 Attorneys for Defendant,
 10 ARTHUR ANDERSEN & CO.,
 11 a Societe par Actions Simplifiees under the laws of France

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

15 ANDERSEN TAX LLC, a Delaware limited
 16 liability company

17 Plaintiff,

18 v.

19 **STEPHANE LAFFONT-REVEILHAC**, an
 20 individual; **VERONIQUE MARTINEZ**; an
 21 individual; **ARTHUR ANDERSEN & CO.,**
 22 **SAS**, a Societe par Actions Simplifiee under
 23 the laws of France; and **MOHALA**
 24 **ENTERPRISES, LLC D/B/A SUNDIAL**
 25 **CONSULTING**, a California limited liability
 26 Company.

27 Defendants.

28 **Case No. 17-CV-01311**

STIPULATED REQUEST AND
[PROPOSED] ORDER EXTENDING
TIME TO FILE AMENDED ANSWER

Schinner & Shain, LLP
 96 Jessie Street
 San Francisco, CA 94105
 (415) 369-9050 tel. (415) 369-9053 fax

1 Pursuant to United States District Court, Northern District of California Local Rules 6-1
2 and 6-2, and as supported by the Declaration of Reed E. Harvey filed herewith, ANDERSEN
3 TAX LLC, a Delaware limited liability company (“Andersen Tax LLC”) and ARTHUR
4 ANDERSEN & CO., SAS, a Societe par Actions Simplifiee (“Arthur Andersen”) through their
5 undersigned counsel, hereby stipulate and respectfully request an extension of time for Arthur
6 Andersen to file an amended answer in this action by 20 days.

7 WHEREAS, by order dated June 16, 2017, Judge Edward M. Chen ordered Arthur
8 Andersen to obtain counsel and file an amended Answer by July 31, 2017 pursuant to an Order
9 Granting in Part and Denying in Part Plaintiff’s Motion to Strike Defendant’s Answer;

10 WHEREAS, Arthur Andersen retained its counsel, Reed E. Harvey and Frederick K.
11 Koenen of SCHINNER & SHAIN, LLP, 96 Jessie Street, San Francisco, CA 94105 on July 28,
12 2017;

13 WHEREAS, the Parties are in agreement that the Court should enlarge time for Arthur
14 Andersen to file an amended answer to Plaintiff’s complaint.

15 NOW, THEREFORE, pursuant to Local Rule 6-2, the parties through their respective
16 counsels stipulate to the Court’s entry of an Order granting Arthur Andersen an extension of time
17 to and including on August 17, 2017 in which to file an amended answer to the complaint filed in
18 this action.

19 **IT IS SO STIPULATED,**

20 DATED: July 31, 2017

SCHINNER & SHAIN, LLP

21 _____
/s/

22 Reed E. Harvey
23 Attorneys for Defendant
24 ARTHUR ANDERSEN & CO.,
25 SAS, a Societe par Actions Simplifiee
26 under the laws of France

27 _____
/s/

28 Chantal Z. Hwang
Attorneys for Plaintiff
ANDERSEN TAX LLC, a Delaware limited
liability company

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ATTESTATION FOR SIGNATURE

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories.

DATED: July 31, 2017

_____/s/_____
REED E. HARVEY

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(415) 369-9050 tel. (415) 369-9053 fax

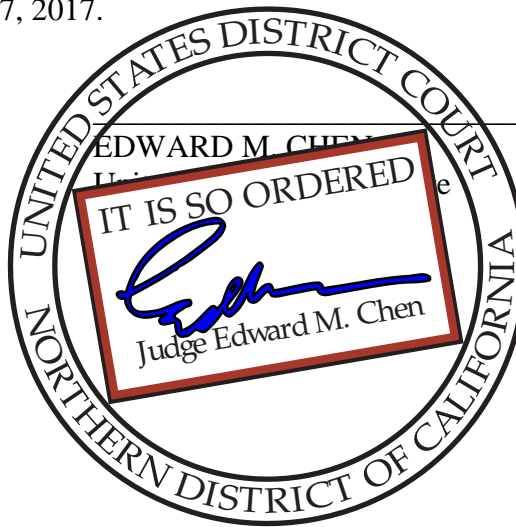
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~~PROPOSED~~ ORDER

Having considered the parties' Stipulated Request for an Order Changing Time, and for good cause shown,

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED, that Arthur Andersen should file its Amended Answer by August 17, 2017.

DATED: July ³¹ __, 2017



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9 Attorneys for Defendant,
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27 Defendants.
28

Case No. 17-CV-01311

**DECLARATION OF REED E. HARVEY
IN SUPPORT OF STIPULATED
REQUEST AND [PROPOSED] ORDER
EXTENDING TIME TO FILE AMENDED
ANSWER**

1 I, Reed E. Harvey, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and
3 admitted to practice before this Court. I am an attorney with Schinner & Shain, LLP, which is
4 counsel for defendant ARTHUR ANDERSEN & CO., SAS, a Societe par Actions Simplifiee
5 (“Arthur Andersen”). I have personal knowledge of each fact stated in this declaration, except
6 for ones stated on information and belief, and would offer competent testimony as to the matters
7 herein if called to do so.

8 2. Plaintiff ANDERSEN TAX LLC, a Delaware limited liability company
9 (“Andersen Tax LLC”) and defendant Arthur Anderson through their respective counsel of
10 record are stipulating to the entry of an order pursuant to which request is made that the Court
11 extend the time in which Arthur Anderson may file an Amended Answer in this case from July
12 31, 2017 to August 17, 2017.

13 3. The request is made for good cause in that Arthur Anderson engaged Schinner &
14 Shain, LLP to represent them in this action in the afternoon of July 28, 2017. We are acting
15 diligently in this matter, however, we will be unable to file an amended answer by July 31, 2017
16 and request that the stipulated Order be entered by the Court. Our client is a French entity and
17 our client’s representatives are all located in France. As a result of our retention and the
18 immediate need to obtain the requested extension we not have yet had time to discuss the
19 substance of this litigation with our client or conduct a thorough review of the complaint, its
20 allegations and legal theories.

21 4. In reviewing the docket for this case, it appears that there were two previous
22 modification of time in this case:

- 23 a. By Order filed May 30, 2017 this Court (1) extended the last day for the
24 parties to meet and confer under confer under Fed. R. Civ. P. 26(f) from May
25 25, 2017 to June 26, 2017; (2) extended the last day for the parties to file the
26 Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f)
27 Report, and file the Joint Case Management Statement from June 8, 2017 to
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July 20, 2017; and (3) continued the Initial Case Management Conference previously set for June 15, 2017 at 9:30a.m to July 27, 2017 at 9:30 a.m.

b. By Minute Order Dated June 16, 2017, the Court order an extension of the due date for the Case Management Statement to August 31, 2017 and the initial Case Management Conference was rescheduled from July 27, 2017 to September 7, 2017 at 9:30 a.m.

5. Arthur Andersen believes that it will be able to comply with these dates and that there should be no need for an additional extension of time.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 31st day of July, 2017, at San Francisco, California.

s/Reed E. Harvey
Reed E. Harvey

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CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is SCHINNER & SHAIN LLP. 96 Jessie Street, San Francisco, CA 94105.

On **July 31, 2017**, I served the following document(s) by the method indicated below:

- **STIPULATED REQUEST AND [PROPOSED] ORDER EXTENDING TIME TO FILE AMENDED ANSWER**
- **DECLARATION OF REED HARVEY**

X ECF SYSTEM

By filing the document(s) listed above on the Court’s Electronic Case Filing System. I am informed and believe that the documents will be electronically served on all individuals registered with such system. For individuals not registered with the ECF system, I have placed the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below for delivery. I am readily familiar with the firm’s practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business.

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 31, 2017, at San Francisco, California.

s/Alice Duclos
Alice Duclos

SERVICE LIST

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