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10 *Attorneys for Defendants*
 11 *Taitso Corporation and Taitso America, Inc.*

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

15 The AASI Beneficiaries' Trust, by and
 16 through Kenneth A. Welt, Liquidating
 17 Trustee,

18 Plaintiff,

19 vs.

20 AVX Corporation et al.,

21 Defendants.

Case No.: 3:17-cv-03472-EMC

**Stipulation and ~~Proposed~~ Order
 Extending the Deadline for Taitso
 Corporation and Taitso America, Inc. to
 File an Answer**

1 Pursuant to Civil Local Rule 6-2, Defendants Taitso Corporation and Taitso America,
2 Inc. (collectively, the “Stipulating Defendants”), and Plaintiff The AASI Beneficiaries’ Trust,
3 by and through Kenneth A. Welt, Liquidating Trustee (“AASI”) respectfully request that the
4 Court enter the parties’ stipulation below that extends the time for each of the Stipulating
5 Defendants to file an answer to AASI’s Complaint (“Complaint”) (ECF No. 1).

6 **FACTUAL BACKGROUND TO PARTIES’ STIPULATION**

7 In support of this stipulation, the undersigned parties provide the following facts,
8 which are verified in the supporting Declaration of Aaron Gott filed concurrently herewith:

9 1. On August 29, 2016, AASI filed a Complaint in the United States District
10 Court, Southern District of Florida. (ECF No. 1.)

11 2. On December 29, 2016, the Court in the Southern District of Florida
12 ordered that Defendants respond to the Complaint within 45 days of the Court’s order on
13 Defendant’s motion to transfer this action to the United States District Court, Northern
14 District of California. (ECF No. 55.)

15 3. On June 14, 2017, the Court in the Southern District of Florida ordered
16 that this action be transferred to the Northern District of California. (ECF No. 105.)

17 4. On July 14, 2017, this action was reassigned to this Court from Magistrate
18 Judge Laurel Beeler. (ECF No. 137.)

19 5. On July 20, 2017, an Administrative Motion to Consider Whether Cases
20 Should Be Related (“Administrative Motion”) was filed in *In re Capacitors Antitrust*
21 *Litigation*, Master File No. 3:14-cv-03264-JD, requesting that this action be related to *In*
22 *re Capacitors Antitrust Litigation* and assigned to District Judge James Donato. (Master
23 File No. 3:14-cv-03264-JD, ECF No. 1757.) Other related cases have previously been
24 transferred to Judge Donato.

25 6. The Stipulating Defendants’ current deadline to respond to the Complaint
26 is July 31, 2017.

27 7. Counsel for the Stipulating Defendants have informed counsel for AASI
28 that the Stipulating Defendants will file an answer to the Complaint. AASI has therefore

1 agreed to extend the time for each of the Stipulating Defendants to file an answer to
2 September 29, 2017.

3 8. The parties believe that the interests of judicial economy and efficiency will
4 be well served by extending the time for the Stipulating Defendants to file an answer to
5 the Complaint.

6 **STIPULATION**

7 In light of these facts, the undersigned parties jointly request that the Court enter
8 the following stipulation as an Order of the Court: The deadline for each of the Stipulating
9 Defendants to file an answer to the Complaint is extended to September 29, 2017.

10 IT IS SO STIPULATED.

11 DATED: July 28, 2017

BONA LAW PC

12 /s/ Aaron Gott
13 AARON GOTT

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Taitso Corporation and Taitso America, Inc.

22 DATED: July 28, 2017

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11 *Attorneys for Plaintiff The AASI*
12 *Beneficiaries' Trust, by and through*
13 *Kenneth A. Welt, Liquidating Trustee*

14 **ECF ATTESTATION**

15 I, Aaron Gott, am the ECF User whose ID and Password are being used to file this
16 motion. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
17 signatories has concurred in this filing.

18 DATED: July 28, 2017

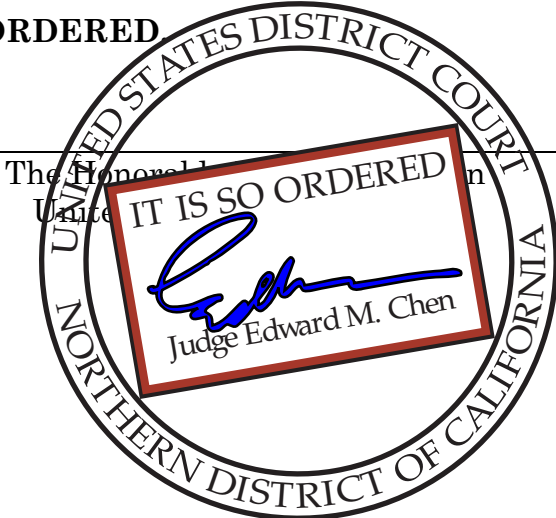
19 BONA LAW PC

20 */s/ Aaron Gott*
21 _____
22 AARON GOTT

1 [PROPOSED] ORDER

2 PURSUANT TO STIPULATION, IT IS SO ORDERED

3 Dated: 7/31/17



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