

1 COOLEY GODWARD KRONISH LLP
 GORDON C. ATKINSON (122401) (atkinsongc@cooley.com)
 2 CHANEE FRANKLIN (236068) (franklincn@cooley.com)
 BENJAMIN KLEINE (257225) (bkleine@cooley.com)
 3 101 California Street, 5th Floor
 San Francisco, CA 94111-5800
 4 Telephone: (415) 693-2000
 Facsimile: (415) 693-2222
 5

Attorneys for Defendants and Nominal Defendant
 6 AMERICAN CENTURY COMPANIES, INC., AMERICAN
 CENTURY INVESTMENT MANAGEMENT, INC., JAMES
 7 E. STOWERS, JR., JONATHAN S. THOMAS, THOMAS A.
 BROWN, ANDREA C. HALL, DONALD H. PRATT, GALE
 8 A. SAYERS, M. JEANNINE STRANDJORD, TIMOTHY S.
 WEBSTER, WILLIAM M. LYONS, MARK MALLON,
 9 WADE SLOME, BRUCE WIMBERLY, JERRY SULLIVAN
 and AMERICAN CENTURY MUTUAL FUNDS, INC., doing
 10 business as AMERICAN CENTURY ULTRA FUND

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

15 LAURA SEIDL, individually, derivatively and on behalf
 16 of all others similarly situated,

17 Plaintiff,

18 v.

19 AMERICAN CENTURY COMPANIES, INC.,
 AMERICAN CENTURY INVESTMENT
 20 MANAGEMENT, INC., JAMES E. STOWERS, JR.,
 JONATHAN S. THOMAS, THOMAS A. BROWN,
 21 ANDREA C. HALL, DONALD H. PRATT, GALE A.
 SAYERS, M. JEANNINE STRANDJORD, TIMOTHY S.
 22 WEBSTER, WILLIAM M. LYONS, MARK MALLON,
 WADE SLOME, BRUCE WIMBERLY, and JERRY
 23 SULLIVAN,

24 Defendants.

25 AMERICAN CENTURY MUTUAL FUNDS, INC.,
 doing business as AMERICAN CENTURY ULTRA
 26 FUND,

27 Nominal Defendant.
 28

Case No. CV-08-4117 EMC

**STIPULATION TO ENLARGE
 TIME TO RESPOND TO
 COMPLAINT ; ORDER**

1 WHEREAS, Plaintiff filed a Complaint in this action on August 28, 2008;

2 WHEREAS, Plaintiff served Defendant American Centuries Companies, Inc, ("American
3 Century") with a copy of the Complaint on September 3, 2008 and has made efforts to serve the
4 various other Defendants;

5 WHEREAS, under Fed. R. Civ. P. 12(a)(1)(A)(i), American Century has until and
6 including September 23, 2008 to answer, move, or otherwise respond to the Complaint;

7 WHEREAS, Defendants have requested, and Plaintiff has agreed to, an extension for
8 American Century, and all other Defendants on whose behalf service of process has been
9 accepted herein, to respond to the Complaint until and including October 31, 2008, to facilitate a
10 uniform response schedule;

11 WHEREAS, Defendants have not made any previous requests for an extension;

12 IT IS HEREBY STIPULATED by Plaintiff and Defendants that


- 13 1. The undersigned defense counsel, on behalf of all of the Defendants,
- 14 hereby acknowledges service of the summons and complaint on their
- 15 respective clients and hereby waive Defendants' defenses, if any, based on
- 16 Fed. R. Civ. P. 12(b)(4) (insufficient process) or 12(b)(5) (insufficient
- 17 service of process); and
- 18 2. Defendants have until and including October 31, 2008 to answer, move, or
- 19 otherwise respond to the Complaint.

20 IT IS SO STIPULATED.

21
22
23
24
25
26
27
28

Dated: September 23, 2008

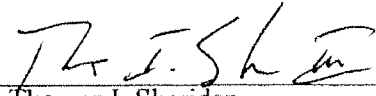
SIMMONSCOOPER LLC

By: 
Crystal G. Howard

Attorneys for Plaintiff
LAURA SEIDL

1 Dated: September ²⁴____, 2008

HANLY CONROY BIERSTEIN SHERIDAN FISHER
& HAYES LLP

2
3
4 By: 
5 Thomas I. Sheridan

6 Attorneys for Plaintiff
7 LAURA SEIDL

8 Dated: September ²³____, 2008

COOLEY GODWARD KRONISH LLP

9
10 By: 
11 Gordon C. Atkinson

12 Attorneys for Defendants and Nominal Defendant

13 AMERICAN CENTURY COMPANIES, INC.,
14 AMERICAN CENTURY INVESTMENT
15 MANAGEMENT, INC., JAMES E. STOWERS, JR.,
16 JONATHAN S. THOMAS, THOMAS A. BROWN,
17 ANDREA C. HALL, DONALD H. PRATT, GALE A.
18 SAYERS, M. JEANNINE STRANDJORD,
19 TIMOTHY S. WEBSTER, WILLIAM M. LYONS,
20 MARK MALLON, WADE SLOME, BRUCE
21 WIMBERLY, JERRY SULLIVAN and AMERICAN
22 CENTURY MUTUAL FUNDS, INC., doing business
23 as AMERICAN CENTURY ULTRA FUND

24 IT IS SO ORDERED:

25 _____
26 Edward M. Chen
27 U.S. Magistrate Judge

