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7 Attorneys for Defendant
 LeadClick Media, Inc.

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 CHRISTOPHER KRAMER, individually
 13 and on behalf of all others similarly
 14 situated,

15 Plaintiff,

16 v.

17 AUTOBYTEL, INC., a Delaware
 corporation; B2MOBILE, LLC, a
 18 California limited liability company; and
 19 LEADCLICK MEDIA, INC., a California
 20 corporation,

21 Defendants.

Case No. C10-02722-CW

**JOINT STIPULATION AND ORDER
 EXTENDING DEADLINES RE
 SETTLEMENT AGREEMENTS AND
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Honorable Claudia Wilken, Ctrm. 2

Complaint Filed: November 17, 2009

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REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

1 Plaintiff Christopher Kramer, (“Plaintiff” or “Kramer”) and Defendants
2 B2Mobile, LLC (“B2M”) and LeadClick Media, Inc. (“LeadClick”) (collectively
3 referred to as the “Parties”) enter into this joint stipulation with reference to the
4 following facts:

5 **RECITALS**

6 A. WHEREAS the Court’s Minute Order and Case Management Order
7 entered on January 4, 2011, sets forth a number of dates and deadlines, including a
8 deadline for completion of private mediation on March 31, 2011;

9 B. WHEREAS on March 29, 2011, the Parties participated in a day-long
10 mediation conducted by Professor Eric D. Green of Resolutions, LLC;

11 C. WHEREAS the Parties reached a proposed settlement during the
12 mediation with the assistance of Professor Green;

13 D. WHEREAS on April 5, 2011, the Court entered an Order vacating dates
14 and deadlines in the Minute Order and Case Management Order entered on January 4,
15 2011;

16 E. WHEREAS pursuant to the Court’s Order and as agreed by stipulation of
17 the parties, the deadline to finalize settlement agreements is 45 days from the Court’s
18 Order entered on April 5, 2011, which is May 20, 2011;

19 F. WHEREAS pursuant to the Court’s Order and as agreed by stipulation of
20 the parties, the deadline to prepare and file a motion for preliminary approval of the
21 class action settlement is 60 days from the Court’s Order entered on April 5, 2011,
22 which is June 3, 2011;

23 G. WHEREAS the Parties have exchanged multiple drafts of the settlement
24 agreement and related documents and are working diligently in finalizing their
25 settlement agreement, but due to the complexity of the matter, the Parties are in need
26 of additional time to time to finalize the settlement agreements;

1 H. WHEREAS the Plaintiff needs additional time, after the settlement
2 agreements have been signed, to prepare and file a motion for preliminary approval of
3 the class action settlement; and

4 I. WHEREAS the Parties expect that the settlement agreements will be
5 signed and the motion for preliminary approval of the class action settlement will be
6 filed well in advance of the Case Management Conference scheduled by the Court on
7 July 26, 2011, in the event that no motion for preliminary approval is filed by that
8 date. The Parties do not anticipate that any further extensions will be required in order
9 to finalize the class action settlement agreement.

10 **STIPULATION**

11 **NOW, THEREFORE,** it is hereby stipulated by the parties, through their
12 respective counsel of record, as follows:

- 13 1. The deadline for the Parties to finalize settlement agreements is extended
- 14 from May 20, 2011 to June 20, 2011; and
- 15 2. The deadline for the Plaintiff to prepare and file a motion for preliminary
- 16 approval of the class action settlement is extended from June 3, 2011 to July 8, 2011.

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18 **IT IS SO STIPULATED.**

19
20 DATED: May 18, 2011. EDELSON McGUIRE, LLC

21
22 By _____ / S / Ryan D. Andrews
23 Christopher Dore
24 Michael J. McMorrow
25 Ryan D. Andrews
26 Sean Reis
27 Attorneys for Plaintiff
28 Christopher Kramer

1 DATED: May 18, 2011.

SUMMIT LAW GROUP PLLC

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3 By / S / Philip S. McCune

Philip S. McCune
Molly A. Terwilliger
Attorneys for Defendant
B2Mobile, LLC

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5
6 DATED: May 18, 2011.

HANSON BRIDGETT LLP

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8 By / S / Arman Javid

Arman Javid
Raymond F. Lynch
Megan Oliver Thompson
Attorneys for Defendant
B2Mobile, LLC

9
10 DATED: May 18, 2011.

REED SMITH LLP


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12 By / S / Roxanne M. Wilson

Roxanne M. Wilson
Attorneys for Defendant
LeadClick Media, Inc.

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17 **ORDER**

18 Based on the above Stipulation, **IT IS SO ORDERED.**

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20 DATED: MAY 23 , 2011


The Honorable Claudia Wilken
United States District Court Judge