

1 RONALD E. WOOD, SBN 133854
 rwood@proskauer.com
 2 JENNIFER L. ROCHE, SBN 254538
 jroche@proskauer.com
 3 PROSKAUER ROSE LLP
 2049 Century Park East, Suite 3200
 4 Los Angeles, CA 90067-3206
 Telephone: 310-557-2900
 5 Facsimile: 310-557-2193

6 Attorneys for Defendant
 Wachovia Securities, LLC
 7 n/k/a Wells Fargo Advisors, LLC

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

GREGORY R. RAIFMAN and SUSAN
 RAIFMAN, husband and wife, individually and
 on behalf of their marital community and as
 Trustees of the RAIFMAN FAMILY
 REVOCABLE INTERVIVOS TRUST and as
 beneficiaries of the PALLADIAN TRUST;
 GEKKO HOLDINGS, LLC, and HELICON
 INVESTMENTS, LTD.,

Plaintiffs,

v.

WACHOVIA SECURITIES, LLC, N/K/A
 WELLS FARGO ADVISORS, LLC;

Defendant.

Case No. C 11-02885 SBA

**STIPULATION WITHDRAWING
 OPPOSITION AND CONSENTING TO
 FILING OF PLAINTIFFS' PROPOSED
 SECOND AMENDED COMPLAINT**

Hon. Sandra B. Armstrong

Case No. C 11-02885 SBA

STIPULATION WITHDRAWING OPPOSITION AND CONSENTING TO FILING OF PLAINTIFFS' PROPOSED
 SECOND AMENDED COMPLAINT

1 WHEREAS, on March 11, 2013, the Court denied Defendant's motion to dismiss the First
2 Amended Complaint on procedural grounds;

3 WHEREAS, Plaintiffs' Motion for Leave To File Proposed Second Amended Complaint
4 ("Motion for Leave"), is scheduled for hearing on March 19, 2013; and

5 WHEREAS, on March 15, 2013, counsel for Defendant advised counsel for Plaintiffs of
6 Defendant's intent to withdraw its opposition to Plaintiffs' pending motion and consent to Plaintiffs'
7 filing the proposed Second Amended Complaint.

8 NOW THEREFORE, the parties, through their respective counsel, hereby stipulate and agree
9 that:

10 1. Defendant hereby withdraws its opposition to Plaintiffs' Motion For Leave To File
11 Proposed Second Amended Complaint;

12 2. Defendant consents to Plaintiffs' filing the [Proposed] Second Amended Complaint,
13 previously filed as Docket No. 105-1, reserving its right to file any appropriate motion directed
14 against it, including a motion to dismiss; and

15 3. Defendant's time to respond to the First Amended Complaint is hereby adjourned *sin*
16 *die*.

17
18 Dated: March 15, 2013

RONALD E. WOOD
JENNIFER L. ROCHE
PROSKAUER ROSE LLP

19
20 By: / s / Ronald E. Wood
21 Ronald E. Wood

22 Attorneys for Defendant

23
24 Dated: March 15, 2013

Tod Aronovitz (*Pro Hac Vice*)
Barbara Perez (*Pro Hac Vice*)
Andrew Zelmanowitz (*Pro Hac Vice*)
ARONOVITZ LAW

25
26 By: / s / Tod Aronovitz
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28 Attorneys for Plaintiffs

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/18/13



Hon. Sandra B. Armstrong
United States District Judge