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

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

12 GREGORY R. RAIFMAN and SUSAN
 RAIFMAN, husband and wife, individually and
 13 on behalf of their marital community and as
 Trustees of the RAIFMAN FAMILY
 14 REVOCABLE INTER VIVOS TRUST and as
 beneficiaries of the PALLADIAN TRUST;
 15 GEKKO HOLDINGS, LLC, and HELICON
 INVESTMENTS, LTD; EDWARD and
 16 LORRAINE KURATA, as husband and wife;
 JAMES LOOMIS; JEFFREY CHOU; and
 17 BRUCE CARDINAL, as Trustee of the
 ROBERT J. CARDINAL
 18 GRANDCHILDREN'S TRUST, and the
 MARION I. CARDINAL TRUST, and as
 19 Managing Member of REDBIRD
 INVESTMENT GROUP, LLC.,

20 Plaintiffs,

21 v.

22 WELLS FARGO ADVISORS, LLC, successor
 23 in interest to WACHOVIA SECURITIES,
 LLC; and WACHOVIA SECURITIES, LLC,

24 Defendants.

Case No. C 11-02885 SBA

**STIPULATION TO ENLARGE
 DEFENDANT'S TIME TO RESPOND TO
 PLAINTIFFS' SECOND AMENDED
 COMPLAINT, PLAINTIFFS' TIME TO
 OPPOSE ANY MOTION MADE
 PURSUANT TO FRCP 12(b) AND
 DEFENDANT'S TIME TO REPLY**

Hon. Sandra B. Armstrong

26 WHEREAS, on March 19, 2013, Plaintiffs, Gregory R. Raifman and Susan Raifman,
 27 husband and wife, individually and on behalf of their marital community and as Trustees of Plaintiff,
 28 The Raifman Family Revocable Inter Vivos Trust, as beneficiaries of Plaintiff, The Palladian Trust,

1 as sole members of Gekko Holdings, Ltd. and as assignees in interest and beneficial owners of
2 Plaintiff, Helicon Investments, Ltd.; Edward and Lorraine Kurata, husband and wife; James Loomis;
3 Jeffrey Chou and Bruce Cardinal, as Trustee of the Robert J. Cardinal Grandchildren's Trust, and as
4 Trustee of the Marion I. Cardinal Trust, and as Managing Member of Redbird Investment Group,
5 LLC. (collectively, "Plaintiffs"), filed their Second Amended Complaint ("SAC") in this action;

6 WHEREAS, Defendant Wachovia Securities, LLC n/k/a Wells Fargo Advisors, LLC's
7 ("Defendant") response to the SAC is due on April 2, 2013, pursuant to Federal Rule of Civil
8 Procedure 15(a)(3);

9 WHEREAS, Plaintiffs' opposition to any motion Defendant may make pursuant to Federal
10 Rule of Civil Procedure 12(b) would be due on April 16, 2013, pursuant to Local Rule 7-3;

11 WHEREAS, Defendant's reply to any opposition Plaintiffs may file would be due on April
12 23, 2013, pursuant to Local Rule 7-3; and

13 WHEREAS, the parties have discussed and agreed that it is their mutual request to extend
14 their respective filing dates,

15 NOW, THEREFORE, the parties, through their counsel, hereby stipulate and agree, pursuant
16 to Local Rule 6-1, that Defendant shall have up to and including April 16, 2013, to answer or
17 otherwise respond to the SAC; that Plaintiffs shall have up to and including May 7, 2013 to file an
18 opposition to any motion Defendant may file pursuant to Federal Rule of Civil Procedure 12(b); and
19 that Defendant may thereafter have up to and including May 21, 2012 to file any reply to any
20 opposition Plaintiffs may file. This Stipulation is agreed upon without prejudice to Plaintiffs' right
21 to seek an additional extension of time after Defendant's filings and in the event that multiple
22 motions are filed by Defendant. This extended briefing schedule will not alter the date of any event
23 or deadline already fixed by Court order.

24 Dated: March 25, 2013

RONALD E. WOOD
JENNIFER L. ROCHE
PROSKAUER ROSE LLP

25 By: /s/ Ronald E. Wood

Ronald E. Wood

26 Attorneys for Defendant

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Dated: March 25, 2013

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

By: / s / Tod Aronovitz

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

Dated: 3/27/13



Hon. Sandra B. Armstrong
United States District Judge