

1 SEAN REIS (#184044) (sreis@edelson.com)
 2 EDELSON MCGUIRE, LLP
 3 30021 Tomas Street, Suite 300
 4 Rancho Santa Margarita, California 92688
 5 Tel: (949) 459-2124
 6 Fax: (949) 459-2123

7 JAY EDELSON (jedelson@edelson.com)
 8 RAFEY S. BALABANIAN (rbalabanian@edelson.com)
 9 WILLIAM C. GRAY (wgray@edelson.com)
 10 ARI J. SCHARG (ascharg@edelson.com)
 11 EDELSON MCGUIRE, LLC
 12 350 North LaSalle Street, Suite 1300
 13 Chicago, Illinois 60654
 14 Tel: (312) 589-6370
 15 Fax: (312) 589-6378

16 *Attorneys for Plaintiff and the Putative Class*

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 OAKLAND DIVISION

20 DANIEL RODRIGUEZ,

21 Plaintiff,

22 v.

23 SONY COMPUTER ENTERTAINMENT
24 AMERICA, LLC,

25 Defendant.

Case No. 11-CV-4084-PJH

STIPULATION ENLARGING TIME TO
RESPOND TO DEFENDANT’S MOTION TO
DISMISS

Hon. Phyllis J. Hamilton

26 Pursuant to Civil Local Rule 6.1, Plaintiff Daniel Rodriguez (“Plaintiff”) and Defendant
 27 Sony Computer Entertainment America, LLC (“Defendant”) (collectively, the “Parties”), hereby
 28 stipulate as follows:

WHEREAS, on August 18, 2011, Plaintiff filed a putative Class Action Complaint
 (“Complaint”) against Defendant in the above-captioned matter (Dkt. No. 1);

1 WHEREAS, on October 21, 2011, the Parties filed a stipulation extending Defendant's
2 deadline to respond to the Complaint to November 30, 2011. (Dkt. No. 20);

3 WHEREAS, Defendant filed its Motion to Dismiss the Complaint on November 30,
4 2011. (Dkt. No. 21);

5 WHEREAS, Plaintiff's deadline to respond to the Motion to Dismiss is currently due on
6 December 14, 2011.

7 WHEREAS, Plaintiff requests, and Defendant has agreed, to enlarge Plaintiff's deadline
8 to respond to Defendant's Motion to Dismiss by seven (7) days.

9 WHEREAS, the requested enlargement of time will not effect the motion hearing set for
10 February 8, 2012.

11 NOW THEREFORE, the Parties hereby stipulate as follows:

12 1. Plaintiff shall have up to and including December 21, 2011 to respond to
13 Defendant's Motion to Dismiss; and

14 2. Defendant shall have up to and including January 6, 2012 to file its reply in
15 support of its motion to dismiss.

16 IT IS SO STIPULATED.

17 Dated: December 13, 2011

18 Respectfully submitted,

19 **DANIEL RODRIGUEZ**, individually and on
20 behalf of all others similarly situated,

21 By: Ari J. Scharg
22 One of Plaintiff's Attorneys

23 SEAN REIS - SBN 184044
24 *sreis@edelson.com*
25 30021 Tomas Street, Suite 300
26 Rancho Santa Margarita, California 92688
27 Tel: (949) 459-2124
28 Fax: (949) 459-2123

JAY EDELSON
(jedelson@edelson.com)
RAFEY S. BALABANIAN
(rbalabanian@edelson.com)
WILLIAM C. GRAY
(wgray@edelson.com)
ARI J. SCHARG
(ascharg@edelson.com)
EDELSON MCGUIRE, LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: (312) 589-6370
Fax: (312) 589-6378

Dated: December 13, 2011

Respectfully submitted,

**SONY COMPUTER ENTERTAINMENT
AMERICA, LLC,**

By: Ray A. Sardo
One of Defendant's Attorneys

COOLEY LLP
MICHAEL G. RHODES (116127)
(rhodesmg@cooley.com)
RAY A. SARDO (245421) (rsardo@cooley.com)
101 California Street, 5th Floor San Francisco, CA
94111-5800
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

COOLEY LLP
MICHELLE C. DOOLIN (179445)
(doolinmc@cooley.com)
NICOLAS J. ECHEVESTRE (273747)
(nechevestre@cooley.com)
4401 Eastgate Mall
San Diego, CA 92121-1909
Telephone: (858) 550-6000
Facsimile: (858) 550-6420

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation Extending Time to Respond to Defendant's Motion to Dismiss.

Dated: December 13, 2011

Edelson McGuire LLC

/s/ Sean Reis
Sean Reis

SEAN REIS - SBN 184044
sreis@edelson.com
30021 Tomas Street, Suite 300
Rancho Santa Margarita, California 92688
Tel: (949) 459-2124
Fax: (949) 459-2123

1 PURSUANT TO STIPULATION, IT IS ORDERED THAT:

2 1. Plaintiff shall have up to and including December 21, 2011 to respond to
3 Defendant's Motion to Dismiss; and

4 2. Defendant shall have up to and including January 6, 2012 to file its reply in
5 support of its motion to dismiss.
6

7
8 Dated: 12/16/11

Signature: _____

