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8 UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 10 (OAKLAND DIVISION)

11 A AND B AUTO CO INC.,
 12 Plaintiff,
 13 v.
 14 AUTOMOTIVE INDUSTRIES TRUST
 FUNDS; and DOES 1 t o 10,
 15 Defendants.

CASE NO. C 11-04761 LB

**STIPULATION FOR EXTENSION OF
 TIME IN WHICH TO RESPOND TO
 COMPLAINT AND ~~PROPOSED~~
 ORDER**

16 The parties hereby stipulate and request that the Court enter an order extending
 17 Defendant's time to file an answer or other responsive pleading by approximately 60 days. Good
 18 cause exists for the request:

19 1. Plaintiff filed its Complaint in state court on August 2, 2011, and Defendant was
 20 served with that Complaint on August 16, 2011. On September 23, 2011, the case was removed
 21 by Defendant to Federal District Court.

22 2. Since the filing of the Notice of Removal of Action, the parties have conferred
 23 through their counsel of record. They believe that there is a possibility of an early settlement in
 24 this matter and would like to exchange information in hopes of achieving an early resolution.

25 3. If the matter cannot be settled at an early stage, Defendant anticipates filing a
 26 motion to dismiss.

27 4. The Initial Case Management Conference in this action has been set by the Court
 28 for March 29, 2012.

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