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15 Attorneys for Defendants  
16 Medfiler LLC, Alvin Rapp,  
17 and Evan Rapp

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 POGA MGMT PTNRS LLC,  
21  
22 Plaintiff,  
23  
24 v.  
25  
26 MEDFILER LLC, d/b/a RPG  
27 CONSULTANTS, ALVIN RAPP, EVAN  
28 RAPP and DOES 1-20,  
  
Defendants.

**Case No. 4:12-cv-06087-SBA**

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO FIRST AMENDED  
COMPLAINT AND DATE FOR INITIAL  
DISCLOSURES**

Before the Hon. Sandra Brown Armstrong  
Courtroom 1, 4<sup>th</sup> Floor

Date of Removal: November 30, 2012  
Trial Date: December 8, 2014

1           Whereas, the state court action titled *POGA MGMT PTNRS LLC v. Medfiler LLC, et al.*,  
2 Superior Court Case No. CGC-12-524785, was removed to this Court on November 30, 2012;

3           Whereas, on January 17, 2013, Defendants filed a Motion to Dismiss Under FRCP  
4 12(b)(2) for Lack of Personal Jurisdiction (“Motion to Dismiss”), setting the hearing date for  
5 March 7, 2013;

6           Whereas, the case was reassigned to Judge Armstrong on January 22, 2013, and the March  
7 7, 2013, hearing date was vacated;

8           Whereas, Defendants filed a Re-Notice of Motion to Dismiss Under FRCP 12(b)(2) for  
9 Lack of Personal Jurisdiction (“Motion to Dismiss”), setting the hearing date for April 16, 2013 at  
10 1 p.m.;

11           Whereas, on September 30, 2013, the Court granted in part and denied in part Defendants’  
12 Motion to Dismiss and gave the Plaintiff leave to file an amended complaint;

13           Whereas, on November 1, 2013, the Plaintiff filed a First Amended Complaint (“FAC”);

14           Whereas, the parties have agreed that Defendants’ response to the FAC shall be filed on or  
15 before November 27, 2013;

16           Whereas, the parties have agreed that the initial disclosures required by FRCP 26(a) shall  
17 be served on or before December 13, 2013;

18           THE PARTIES HEREBY STIPULATE to the following:

- 19           1. Defendants’ response to the FAC shall be filed on or before November 27, 2013; and  
20           2. The initial disclosures required by FRCP 26(a) shall be served on or before December  
21           13, 2013.

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1 DATED: November 14, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

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By: /S/ Christopher J. McNamara  
Christopher J. McNamara

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Attorneys for Defendants Medfiler LLC,  
Alvin Rapp, and Evan Rapp

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7 DATED: November 14, 2013

CURIALE WILSON LLP

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By: /S/ Joseph C. Wilson  
Joseph C. Wilson

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Attorneys for Plaintiff POGA MGMT PTNRS LLC

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

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15 DATED: 11/18/2013

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Hon. Sandra Brown Armstrong  
United States District Court Judge

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