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E-filed 8/15/05

6 Attorneys for Defendant
 SIEMENS MEDICAL SOLUTIONS USA, INC.
 7 (erroneously named and sued as
 Siemens Ultra Sound Corporation
 8 in State Court action)

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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

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14 REZA HASSANI,
 Plaintiff,
 15 v.
 16 SIEMENS MEDICAL SOLUTIONS USA, INC.,
 17 and DOES 1-50, Inclusive,
 18 Defendants.

No. C05 03083 JF

**STIPULATION TO EXTEND
 DEFENDANT’S DEADLINE TO FILE
 RESPONSIVE PLEADING**

Honorable Jeremy Fogel

Action Removed: July 29, 2005

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20 Plaintiff Reza Hassani (“Plaintiff”) and Defendant Siemens Medical Solutions USA, Inc.,
 (“Defendant”) hereby stipulate to the following:

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RECITALS

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23 WHEREAS, Plaintiff filed his Complaint in Superior Court of California, County of Santa
 Clara on April 11, 2005, case number 1-05-CV-039062, which Complaint asserts three (3) causes
 24 of action for infliction of emotional distress, termination violative of public policy, and breach of
 25 an implied-in-fact contract;

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27 WHEREAS, Defendant was personally served with a copy of the Complaint on
 June 29, 2005;

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1 WHEREAS, Defendant timely filed a Notice of Removal on July 29, 2005 and removed
2 said action to this Court on the basis of diversity jurisdiction;

3 WHEREAS, Defendant has not yet filed a responsive pleading in response to Plaintiff's
4 Complaint;

5 WHEREAS, the deadline for Defendant to file an answer or other responsive pleading to
6 Plaintiff's Complaint is Friday, August 5, 2005;

7 WHEREAS, the parties have agreed that the deadline for Defendant to file a responsive
8 pleading to Plaintiff's Complaint shall be continued for fourteen (14) days, until Friday, August
9 19, 2005.

10 **STIPULATION**

11 IT IS HEREBY STIPULATED BY THE PARTIES, that the deadline for Defendant to
12 file a responsive pleading in response to Plaintiff's Complaint shall be continued from Friday,
13 August 5, 2005 until Friday, August 19, 2005. Pursuant to this stipulation, Defendant shall file
14 and serve a responsive pleading on or before Friday, August 19, 2005.

15 Dated: August 3, 2005

16 RAYMOND L. WHEELER
17 SHARYN K. FUNAMURA
18 MORRISON & FOERSTER LLP

19 s/Sharyn K. Funamura
20 SHARYN K. FUNAMURA
21 Attorneys for Defendant
22 SIEMENS MEDICAL SOLUTIONS USA, INC.

23 Dated: August 3, 2005

24 FRANK E. MAYO
25 ATTORNEY AT LAW

26 s/Frank E. Mayo
27 FRANK E. MAYO
28 Attorney for Plaintiff
REZA HASSANI

1 I, Sharyn K. Funamura, am the ECF User whose ID and password are being used to file
2 this Stipulation to Continue Defendant's Deadline to File Responsive Pleading. In compliance
3 with General Order 45, X.B., I hereby attest that Frank E. Mayo has concurred in this filing and
4 that I have on file all holograph signatures for any signatures indicated by a "conformed" (s/
5 signature within this efiled document.

6 Dated: August 3, 2005

RAYMOND L. WHEELER
SHARYN K. FUNAMURA
MORRISON & FOERSTER LLP

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By: s/ Sharyn K. Funamura
Sharyn K. Funamura

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Attorneys for Defendant
SIEMENS MEDICAL SOLUTIONS USA, INC.

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15 IT IS SO ORDERED.

16 8/15/05

/s/electronic signature authorized
Judge Jeremy Fogel
United States District Court

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