

1 John L. Slafsky, State Bar No. 195513
Hollis Beth Hire, State Bar No. 203651
2 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
3 650 Page Mill Road
Palo Alto, California 94304-1050
4 Telephone: (650) 493-9300
Facsimile: (650) 493-6811
5 jslafsky@wsgr.com
hhire@wsgr.com

6 Attorneys for Plaintiff
7 Coupons, Inc.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

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13 COUPONS, INC., a California corporation,) Case No. 5:07-cv-03457 HRL
14 Plaintiff,)
15 v.) **OPPOSITION TO MOTION TO**
16 JOHN STOTTLEMIRE, and DOES 1-10,) **EXTEND TIME TO RESPOND TO**
17 Defendants.) **COMPLAINT**
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20 On July 24, 2007, Defendant John Stottlemire (“Defendant”) filed a motion to extend
21 time to respond to the Complaint in this matter. Plaintiff Coupons, Inc. (“Plaintiff”) opposes the
22 motion, on the ground that a 90-day extension unduly delays the progression and ultimate
23 resolution of the case.

24 Plaintiff has agreed to an extension of 11 days, and communicated that it was willing to
25 stipulate to an additional 21 days (setting the response deadline on August 27, 2007, which is 32
26 days after the original date and 52 days after service of process). In suggesting a 32-day
27 extension instead of the 90 days that Defendant requested, Plaintiff considered the impact that
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1 such an extension would have on the Case Management Conference, currently scheduled for
2 October 9, 2007, and the parties' Rule 26 meet and confer deadline, currently scheduled for
3 September 18, 2007. Defendant's proposed extension would reset the deadline for responding to
4 the Complaint to October 24, 2007. If the Case Management Conference proceeds as scheduled
5 on October 9, the value of the meet and confer process and of the Case Management Conference
6 will be diminished without Defendant's answer or responsive motion. If the Case Management
7 Conference is postponed, the initial discussions and interactions in this case will be delayed until
8 late this year or even early next year, and the overall progress and resolution of this case will be
9 unduly delayed.

10 Plaintiff remains willing to accommodate Defendant's request for additional time, but is
11 concerned that a 90-day extension is excessive. For this reason, Plaintiff requests that the motion
12 for a 90-day extension be denied. Plaintiff generally does not object to an extension that would
13 preserve the Court's case management schedule and would allow Plaintiff sufficient time to
14 consider Defendant's responsive papers before the October 9, 2007 Case Management
15 Conference.

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17 Dated: July 25, 2007

WILSON SONSINI GOODRICH & ROSATI

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19 By: 

Hollis Beth Hire
Attorneys for Plaintiff Coupons, Inc.

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1 **CERTIFICATE OF SERVICE BY FACSIMILE AND MAIL**

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3 I, Launa Hovland, declare:

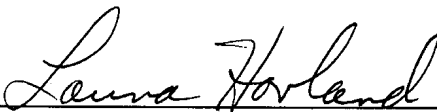
4 I am employed in Santa Clara County. I am over the age of 18 years and not a party to
5 the within action. My business address is Wilson Sonsini Goodrich & Rosati, 650 Page Mill
6 Road, Palo Alto, California 94304-1050.

7 I am readily familiar with Wilson Sonsini Goodrich & Rosati's practice for collection and
8 processing of documents for facsimile transmittal and correspondence for mailing with the
9 United States Postal Service. In the ordinary course of business, documents would be
10 transmitted via facsimile, and correspondence would be deposited with the United States Postal
11 Service on this date.

12 On this date, I served **OPPOSITION TO MOTION TO EXTEND TIME TO**
13 **RESPOND TO COMPLAINT** the person listed below, by consigning the document(s) to a
14 facsimile operator for transmittal and by placing the document(s) described above in an envelope
15 addressed as indicated below, which I sealed. I placed the envelope for collection and mailing
16 with the United States Postal Service on this day, following ordinary business practices at
17 Wilson Sonsini Goodrich & Rosati.

18 John Stottlemire
19 33103 Lake Garrison Street
20 Fremont, CA 94555
Telephone: (614) 358-4185
Email: jstottl@comcast.net

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed at Palo Alto, California on July 26, 2007.

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24 
25 _____
26 Launa Hovland
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OPPOSITION TO MOTION TO
EXTEND TIME TO RESPOND TO
COMPLAINT
CASE NO. 5:07-CV-03457 HRL