

1 KAREN JOHNSON-MCKEWAN (STATE BAR NO. 121570)  
2 NANCY E. HARRIS (STATE BAR NO. 197042)  
3 NIKKA N. RAPKIN (STATE BAR NO. 244207)  
4 ORRICK, HERRINGTON & SUTCLIFFE LLP  
5 The Orrick Building  
6 405 Howard Street  
7 San Francisco, CA 94105-2669  
8 Telephone: (415) 773-5700  
9 Facsimile: (415) 773-5759  
10 kjohnson-mckewan@orrick.com

11 Attorneys for Defendant  
12 GOOGLE INC.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION

16 JENNA GODDARD, on her own behalf and  
17 on behalf of all others similarly situated,

18 Plaintiff,

19 v.

20 GOOGLE INC., a Delaware corporation,

21 Defendant.

CASE NO. 08-02738(JF)

**[PROPOSED] ORDER EXTENDING  
TIME FOR DEFENDANT GOOGLE  
INC. TO RESPOND TO PLAINTIFF'S  
COMPLAINT PURSUANT TO  
LOCAL RULE 6-2**

1 **ORDER**

2 WHEREAS, Plaintiff Jenna Goddard (“Plaintiff”) filed this action in the Superior Court of  
3 the State of California, County of Santa Clara, on April 30, 2008;

4 WHEREAS, Defendant Google Inc. (“Defendant”) removed the above-captioned action to  
5 this Court on May 30, 2008;

6 WHEREAS, Defendant’s response to Plaintiff’s complaint is due June 6, 2008;

7 WHEREAS, Plaintiff will move to remand this litigation to its state court of origin within  
8 the time afforded for such a motion;

9 WHEREAS, to avoid duplication and conserve resources, the parties wish to continue the  
10 time for Defendant to file a response to Plaintiff’s complaint pending determination of Plaintiff’s  
11 motion to remand;

12 WHEREAS, this is the Parties’ first request for an extension of time before the Court in  
13 this matter;

14 WHEREAS the first Case Management Conference in this matter is scheduled for  
15 September 19, 2008, at 10:30 a.m., before the Honorable Judge Jeremy Fogel, and there are no  
16 other dates on calendar in the schedule for this case;

17 WHEREAS, pursuant to Local Rule 6-2 the parties respectfully request the Court to  
18 continue the date for Defendant to respond to Plaintiff’s complaint until 21 days after Plaintiff’s  
19 motion to remand is decided;

20  
21 PURSUANT TO STIPULATION, IT IS SO ORDERED:

22 1. Should this Court deny Plaintiff Jenna Goddard’s Motion to Remand, Defendant  
23 Google Inc. shall file its response to Plaintiff’s Complaint on or before 21 days from this Court’s  
24 issuance of an Order denying Plaintiff’s motion.

25  
26 Dated: 6/12/08

27   
28 United States District Court Judge