

E-filed 7/7/08

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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
 MOTION TO REMAND PURSUANT
 TO LOCAL RULE 6-2**

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23 [PROPOSED] ORDER EXTENDING TIME FOR
 24 DEFENDANT GOOGLE TO RESPOND TO
 25 PLAINTIFF'S MOTION TO REMAND
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ORDER

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

WHEREAS, Defendant Google Inc. (“Defendant”) removed the above-captioned action to this Court on May 30, 2008, and Plaintiff filed a motion to remand the above-captioned action to its state court of origin on June 30, 2008, setting a hearing date of September 5, 2008, for the motion;

WHEREAS, Defendant’s response to Plaintiff’s motion to remand is due August 15, 2008;

WHEREAS, due to schedule conflicts with Defendant’s counsels’ preexisting vacation plans, the parties wish to continue the hearing date for Plaintiff’s motion to remand by two (2) weeks to September 19, 2008, making Defendant’s opposition due August 29, 2008, and Plaintiff’s reply due September 5, 2008;

WHEREAS, this Court has granted the Parties’ prior request to continue the date for Defendant to respond to Plaintiff’s complaint until 21 days after Plaintiff’s motion to remand is decided, and this is the Parties’ first request for an extension with regard to the motion to remand.

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

WHEREAS, pursuant to Local Rule 6-2 the Parties respectfully request the Court to continue the hearing date for Plaintiff’s motion to remand until September 19, 2008;

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2 1. The hearing date for Plaintiff's motion to remand the above-captioned litigation shall
3 be continued to September 19, 2008. Defendant's brief in opposition shall be due August 29,
4 2008, and Plaintiff's reply shall be due September 5, 2008.

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Dated: 7/7/08


The Honorable Judge Jeremy Fogel
United States District Court Judge