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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)

**STIPULATED REQUEST FOR AN  
ORDER EXTENDING TIME FOR  
DEFENDANT GOOGLE INC. TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT PURSUANT TO  
LOCAL RULE 6-2; DECLARATION  
OF NIKKA N. RAPKIN IN SUPPORT**

1 Plaintiff Jenna Goddard (“Plaintiff”) and Defendant Google Inc. (“Defendant”), by and  
2 through their respective counsel of record in this action, hereby present the following Stipulated  
3 Request for an Order Extending Time for Defendant to Respond to Plaintiff’s Complaint and the  
4 concurrently lodged [Proposed] Order Extending Time for Google to Respond to Defendant’s  
5 Complaint:  
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7 WHEREAS, Plaintiff Jenna Goddard (“Plaintiff”) filed this action in the Superior Court of  
8 the State of California, County of Santa Clara, on April 30, 2008;

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

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

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

14 WHEREAS, to avoid duplication and conserve resources, the Parties wish to continue the  
15 time for Defendant to file a response to Plaintiff’s complaint pending determination of the motion  
16 to remand;

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

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

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

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1 IT IS HEREBY STIPULATED:

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

5  
6 SO STIPULATED


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9 Dated: June 4, 2008

KAREN JOHNSON-MCKEWAN  
NANCY E. HARRIS  
NIKKA N. RAPKIN  
ORRICK, HERRINGTON & SUTCLIFFE LLP

  
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Karen Johnson-McKewan  
Attorneys for Defendant  
GOOGLE INC.

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17 Dated: June 4, 2008

MYLES MCGUIRE  
KAMBEREDELSON, LLC

  
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Myles McGuire  
Attorneys for Plaintiff  
JENNA GODDARD

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