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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)

**DECLARATION OF NIKKA N.
RAPKIN IN SUPPORT OF
STIPULATED REQUEST FOR AN
ORDER EXTENDING TIME FOR
DEFENDANT GOOGLE INC. TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

1 I, Nikka N. Rapkin, hereby declare:

2 1. I am a member of the State Bar of California and an associate with the firm of
3 Orrick, Herrington & Sutcliffe LLP, attorneys of record for Defendant Google Inc. ("Google"). I
4 make this declaration in support of the Parties' Stipulated Request for an Order Extending Time
5 for Google to Respond to Plaintiff Jenna Goddard's ("Plaintiff") Complaint.

6 2. Google removed the above-captioned action to this Court on May 30, 2008, and its
7 response to Plaintiff's complaint is therefore due June 6, 2008.

8 3. Plaintiff's counsel has informed me that they plan to move to remand this litigation
9 to its state court of origin.

10 4. In order to conserve resources and avoid the duplication that would result if
11 Plaintiff is successful in her motion to remand, the Parties have stipulated to request this Court to
12 issue an Order extending the time for Google to respond to Plaintiff's complaint until after
13 determination of Plaintiff's motion to remand.

14 5. This is the Parties' first request for an extension of time before the Court in this
15 matter.

16 6. The first Case Management Conference in this action is scheduled for September
17 19, 2008, at 10:30 a.m., before the Honorable Judge Jeremy Fogel, and there are no other dates on
18 calendar in the schedule for this case.

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20 Executed on June ____, 2008, in the City and County of San Francisco, State of California.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

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Nikka N. Rapkin