

1 Joseph J. Siprut (admitted Pro Hac Vice)
 jsiprut@siprut.com
 2 SIPRUT PC
 17 N. State Street
 3 Suite 1600
 Chicago, Illinois 60602
 4 Tel: 312.588.1440
 Fax: 312.427.1850

5
 6 Todd C. Atkins
 tatkins@siprut.com
 7 SIPRUT PC
 701 B Street
 Suite 1400
 8 San Diego, California 92101
 Tel: 619.255.2380
 9 Fax: 619.231.4984

10 Counsel for Plaintiffs and the Proposed Putative Class
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 13 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 14 **SAN JOSE DIVISION**

15 RACHEL FREZZA and MAURO
 RODRIGUEZ, on their own behalf and all
 16 others similarly situated,

17 Plaintiffs,

18 v.

19 GOOGLE INC.,

20 Defendant.

CASE NO. 5:12-CV-00237-RMW

**STIPULATION ENLARGING TIME
 PURSUANT TO LOCAL RULE 6-1(b)**

Judge: Honorable Ronald M. Whyte

Initial Complaint Filed: January 20, 2012

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1 Pursuant to N.D. Cal. Civil Local Rule 6-1(b) and 6-2(a), this stipulated request is entered
2 into between Counsel for Plaintiffs Rachel Frezza and Mauro Rodriguez (collectively
3 “Plaintiffs”) and Defendant Google Inc. (“Google”). The named parties hereby stipulate that
4 Plaintiffs’ First Amended Complaint shall be filed no later than December 27, 2012, and that
5 Defendant’s response to Plaintiff’s First Amended Complaint shall be filed no later than January
6 28, 2013.
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8 WHEREAS, on November 20, 2012, the Court issued an Order granting Defendant’s
9 Motion to Dismiss the Complaint, and granted Plaintiffs 30 days to submit an amended
10 complaint (Docket No. 31);

11 WHEREAS, the named parties filed a stipulation on December 13, 2012 (Docket No. 32)
12 whereby the parties agreed that Plaintiffs would file their First Amended Complaint on or before
13 December 20, 2012;

14 WHEREAS, the Court has not yet entered an Order on the December 13 Stipulation;

15 WHEREAS, the enlargement of time requested herein would serve the convenience of
16 the parties; and
17

18 WHEREAS, the enlargement of time sought will not affect the date of any other event or
19 deadline already fixed by Court order;

20 IT IS HEREBY STIPULATED AND REQUESTED that Plaintiffs shall have until, and
21 including, December 27, 2012 to file their First Amended Complaint and that Defendant shall
22 have until, and including, January 28, 2013 to respond to the First Amended Complaint. If
23 Defendant’s response to the Amended Complaint is not an answer, but rather a motion pursuant
24 to Fed. R. Civ. P. 12, then (i) Plaintiffs’ opposition to that motion shall be filed no later than 30
25 days from the date of service of that motion; and (ii) Defendant’s reply shall be filed no later
26 than 21 days from the date of service of Plaintiffs’ opposition.
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1 Pursuant to Civil Local Rule 6-2(a)(2), the parties state that on February 2, 2012,
2 Plaintiffs agreed to extend Google's time to respond to the Complaint to March 16, 2012; on
3 March 30, 2012, the parties agreed to extend Plaintiffs' time to file their Opposition to Google's
4 Motion to Dismiss until April 20, 2012, and Google's time to file its Reply until May 4, 2012; on
5 May 10, 2012, the parties stipulated and requested that the hearing on Google's motion to
6 dismiss the complaint would be adjourned until June 15, 2012; and on August 20, 2012, the
7 parties agreed that any case management conference would be adjourned until after the Court
8 ruled on Google's Motion to Dismiss.
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10 **IT IS SO STIPULATED AND REQUESTED**
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12 DATED: December 20, 2012

SIPRUT PC

13 By: /s/ Joseph J. Siprut

14 Joseph J. Siprut (Pro Hac Vice)
15 Todd C. Atkins (SBN 208879)

16 Attorneys for Plaintiffs and the
17 Proposed Putative Class

18 DATED: December 20, 2012

MAYER BROWN LLP

19 By: /s/ Jonathan A. Helfgott

20 Edward D. Johnson (SBN 189475)
21 Eric B. Evans (SBN 232476)
22 Jonathan A. Helfgott (SBN 278969)

23 Attorneys for Defendant
24 Google Inc.

25 Filer's attestation: In compliance with General Order 45(x)(B), I hereby attest that concurrence
26 in the filing of this Stipulation has been obtained from counsel for Defendant, Jonathan A.
27 Helfgott.
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/s/ Joseph J. Siprut

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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:

- (1) Plaintiffs shall have until, and including, December 27, 2012 to file their First Amended Complaint.
- (2) Google shall have until, and including, January 28, 2013 to respond to Plaintiffs' First Amended Complaint.
- (3) In the event that Google's response is a motion pursuant to Fed. R. Civ. Proc. 12, Plaintiffs' opposition to that motion shall be filed no later than 30 days from the date of service of that motion, and Defendant's reply shall be filed no later than 21 days from the date of service of Plaintiffs' opposition.

DATED:



HON. RONALD M. WHYTE
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2012 I electronically filed **Stipulation Enlarging Time Pursuant To Local Rule 6-1(b)** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

_____ s/ Joseph J. Siprut _____