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6 Attorneys for Plaintiff and Counter-Claim Defendant  
 7 MARBLE BRIDGE FUNDING GROUP, INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

11 MARBLE BRIDGE FUNDING GROUP, INC.,  
 12 Plaintiff,  
 13 vs.  
 14 NATURE’S OWN PHARMACY, LLC, et al.,  
 15 Defendants.

Case Nos.: 5:12-CV-01839-EJD; 5:12-  
 CV-02729-EJD

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DISCOVERY  
 CUT-OFF PER RECOMMENDATION  
 OF MAGISTRATE JUDGE GREWAL**

16 MARBLE BRIDGE FUNDING GROUP, INC.,  
 17 Plaintiff,  
 18 vs.  
 19 EULER HERMES AMERICAN CREDIT  
 INDEMNITY COMPANY,  
 20 Defendant.

21 EULER HERMES AMERICAN CREDIT  
 INDEMNITY COMPANY,  
 22 Counterclaim Plaintiff,  
 23 vs.  
 24 NATURE’S OWN PHARMACY, LLC,  
 25 RICHARD WALLACE; RICHARD  
 WALLACE, et al.,  
 26 Counterclaim Defendants.  
 27  
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BN 15651960v1

1 By this stipulated motion, the undersigned parties request an order extending the  
2 discovery cut-off by 90 days from March 28, 2014 to June 26, 2014 with a corresponding  
3 extension of the deadline to complete expert discovery. Magistrate Judge Paul S. Grewal, who  
4 has been involved with discovery, has recommended that this extension be granted. Good cause  
5 exists for the extension. The parties were before Judge Grewal to resolve discovery issues on  
6 January 28, 2014. As reported by Euler at the hearing, Euler is in the process of collecting and  
7 reviewing approximately 1,000,000 documents, a process estimated to take approximately two  
8 months and Marble Bridge will need to review the documents after they are produced. Three  
9 depositions have been taken in Florida and the parties are scheduling multiple depositions to be  
10 taken in Maryland and San Francisco and possibly elsewhere, some of which will need to be  
11 taken or continued upon completion of document production.

12 Magistrate Judge Grewal informed the parties that they have his permission to relay to  
13 Judge Davila that a 90 day extension of the discovery deadline is recommended by Judge Grewal.  
14 The expert cut-off will also need to be extended by 90 days in accord with the prior schedule.

15 Dated: February 12, 2014

BUCHALTER NEMER

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18 By: /s/ Randall Manvitz  
19 RANDALL MANVITZ  
20 Attorney for Plaintiff and Counter-Claim  
21 Defendant MARBLE BRIDGE FUNDING  
22 GROUP  
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Dated: February 12, 2014

MECKLER BULGER TILSON MARICK  
& PEARSON LLP

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and

HALPERIN BATTAGLIA RAICHT, LLP

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Counsel for Defendant and Counter-Claim  
Plaintiff EULER HERMES AMERICAN  
CREDIT INDEMNITY COMPANY now  
known as EULER HERMES NORTH  
AMERICA INSURANCE COMPANY

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**ORDER**

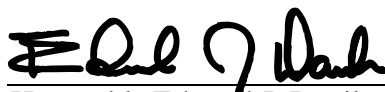
PURSUANT TO MAGISTRATE JUDGE PAUL S. GREWAL'S RECOMMENDATION  
AND THE PARTIES' STIPULATION, IT IS ORDERED AS FOLLOWS:

1. The discovery cutoff is extended from the present deadline of March 28, 2014 to June 26, 2014.

2. The expert discovery cut-off is also extended from the present deadline of April 25, 2014 to July 24, 2014.

**IT IS SO ORDERED.**

Dated: February 14, 2014



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Honorable Edward J. Davila  
Judge of the Northern District Court

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**CERTIFICATE OF SERVICE**

I, Denise H. Field, hereby certify that on this 12th day of February 2014, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A paper copy will be sent, via U.S. Mail, to the following:

Richard Wallace  
712 93<sup>rd</sup> Avenue North  
St. Petersburg, FL 33702

0084362 Marsha Holloway  
c/o Marion County Jail  
700 NW 30<sup>th</sup> Avenue  
Ocala, FL 34475

By:           /s/ Denise H. Field