

1 VENABLE LLP  
 2 Ben Whitwell (SBN 138426)  
 3 bwhitwell@venable.com  
 4 Tamany Vinson Bentz (SBN 258600)  
 5 tbentz@venable.com  
 6 2049 Century Park East, Suite 2100  
 7 Los Angeles, CA 90067  
 8 Telephone: (310) 229-9900  
 9 Facsimile: (310) 229-9901

6 Attorneys for Defendants  
 7 Chiang Fang Chi-yi; Chiang Tsai Hui-mei; Chiang  
 8 Yu-sung; Chiang Yo-lan; Chiang Yo-bo; Chiang  
 9 Yo-chang; Chiang Yo-ching

10 **UNITED STATES DISTRICT COURT**  
 11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**VENABLE LLP**  
 2049 CENTURY PARK EAST, SUITE 2100  
 LOS ANGELES, CA 90067  
 310-229-9900

13 THE BOARD OF TRUSTEES OF THE  
 14 LELAND STANFORD JUNIOR  
 15 UNIVERSITY,

16 Plaintiff,

17 vs.

18 CHIANG FANG CHI-YI, an individual;  
 19 CHIANG YO-MEI, an individual;  
 20 CHIANG HSIAO-CHANG, an individual;  
 21 CHIANG TSAI HUI-MEI, an individual;  
 22 CHIANG YU-SUNG, an individual;  
 23 CHIANG YO-LAN, an individual;  
 24 CHIANG YO-BO, an individual;  
 25 CHIANG YO-CHANG, an individual;  
 26 CHIANG YO-CHING, CHUNGYAN  
 27 CHAN, an individual

26 Defendants.

CASE NO.: 13:cv-04383-EJD

[Honorable Edward J. Davila  
 Courtroom 4

**STIPULATION TO EXTEND  
 TIME FOR DEFENDANTS TO  
 ANSWER OR OTHERWISE  
 RESPOND TO COMPLAINT**

1 WHEREAS the Complaint in the above-entitled action was filed on  
2 September 20, 2013 in the U.S. District Court for the Northern District of  
3 California;

4 WHEREAS, on January 14, 2014, Plaintiff served Defendants Chiang Fang-  
5 Chiyi, Chiang Yo-sung and Chiang Yo-bo with the Complaint via electronic mail  
6 pursuant to the Court's order of January 14, 2014;

7 WHEREAS, Defendants Chiang Fang-Chiyi, Chiang Yo-sung and Chiang  
8 Yo-bo's (hereinafter collectively referred to as "Served Defendants") response to  
9 the Complaint is currently due on February 4, 2014;

10 WHEREAS, Defendants Chian Tsai Hui-mei, Chiang Yo-lan, Chiang Yo-  
11 chang and Chiang Yo-ching (hereinafter collectively referred to as "Waiver  
12 Defendants") agreed to waive service of the Complaint;

13 WHEREAS, the Served Defendants and Waiver Defendants are represented  
14 by the same counsel;

15 WHEREAS, Plaintiff agrees that the Served Defendants and Waiver  
16 Defendants should respond to the Complaint on the same day, April 14, 2014;

17 IT IS HEREBY STIPULATED AND AGREED, PURSUANT TO LOCAL  
18 RULE 6-1, that Defendants Chiang Fang-Chiyi, Chiang Yo-sung and Chiang Yo-  
19 bo's deadline to answer or otherwise respond to the Complaint in the above-  
20 captioned matter is extended until April 14, 2014;

21 IT IS FURTHER STIPULATED AND AGREED, that Defendants Chian  
22 Tsai Hui-mei, Chiang Yo-lan, Chiang Yo-chang and Chiang Yo-ching have  
23 waived service and will also respond to the Complaint on April 14, 2014.

24 Dated: February 3, 2014

VENABLE LLP

25  
26 By: /s/ Tamany Vinson Bentz  
Ben D. Whitwell  
27 Tamany Vinson Bentz  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Attorneys for Defendants  
Chiang Fang Chi-yi; Chiang Tsai  
Hui-mei; Chiang Yu-sung; Chiang  
Yo-lan; Chiang Yo-bo; Chiang Yo-  
chang; Chiang Yo-ching

Dated: February 3 , 2014

PILLSBURY WINTHROP SHAW  
PITTMAN LLP

By: /s/ Mark Davis Litvack  
Mark Davis Litvack  
James Chang  
Attorneys for Plaintiff  
The Board of Trustees of the Leland  
Stanford Junior University

**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT. In compliance with the General Order, I hereby attest that the other signatories to this filing have concurred in this filing.

Dated: February 3, 2014

By: /s/ Tamany Vinson Bentz  
Attorney for Defendants  
Chiang Fang Chi-yi; Chiang  
Tsai Hui-mei; Chiang Yu-sung;  
Chiang Yo-lan; Chiang Yo-bo;  
Chiang Yo-chang; Chiang Yo-  
ching

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of February, 2014, a copy of the foregoing STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT was served via CM/ECF:

Mark Davis Litvack  
James Chang  
Pillsbury Winthrop Shaw Pittman LLP  
725 South Figueroa Street, Suite 2800  
Los Angeles, CA 90017-5406

*Attorneys for Plaintiff The Board of Trustees  
of the Leland Stanford Junior University*

By: /s/ Tamany Vinson Bentz

Attorney for Defendants  
Chiang Fang Chi-yi; Chiang Tsai Hui-  
mei; Chiang Yu-sung; Chiang Yo-lan;  
Chiang Yo-bo; Chiang Yo-chang;  
Chiang Yo-ching