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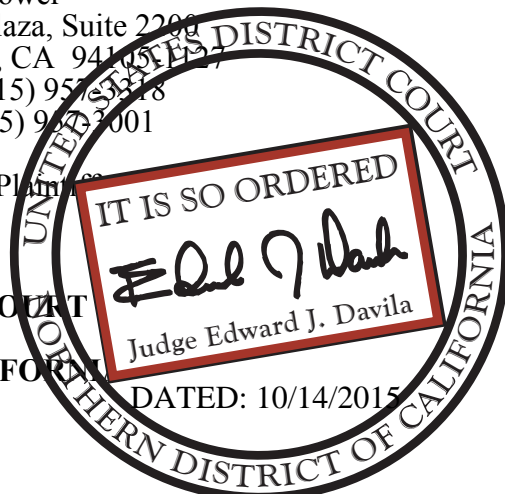
10 Attorneys for Defendants
 Liquid Capital Exchange, Inc., BDB Capital, Inc.
 11 (d/b/a Liquid Capital of Colorado)(erroneously
 sued as Liquid Capital of Colorado), Sol Roter, an
 12 Individual, and Bruce Dawson, an Individual

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Attorneys for Plaintiff

13
 14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN JOSE DIVISION**



17 MARBLE BRIDGE FUNDING GROUP, INC.,
 18 Plaintiff;
 19 v.
 20 LIQUID CAPITAL EXCHANGE, INC., LIQUID
 21 CAPITAL OF COLORADO, SOL ROTER, AN
 INDIVIDUAL, AND BRUCE DAWSON, AN
 22 INDIVIDUAL,
 23 Defendants.

Case No. 5:15-CV-00177-EJD

**STIPULATION EXTENDING TIME TO
 RESPOND TO COMPLAINT**

1 Pursuant to Civil L.R. 6-1, Defendant Sol Roter (“Mr. Roter”) and Plaintiff Marble Bridge
2 Funding Group, Inc. (“Plaintiff”) (collectively “the Parties”), by their respective attorneys of record, in
3 order to stipulate that Mr. Roter’s time to respond to Plaintiff’s Complaint is extended to the date on
4 which Defendants’ response to Plaintiffs’ Amended Complaint is due, state as follows:

5 WHEREAS, Plaintiff filed a Complaint for Damages on December 3, 2014;

6 WHEREAS, on January 20, 2015, Defendants filed the following: (1) Motion to Dismiss for Lack
7 of Personal Jurisdiction and Motion to Quash Service of Process [Dkt. No. 8]; and (2) Motion to Dismiss
8 pursuant to Federal Rule of Civil Procedure 12(b)(6) [Dkt. No. 9];

9 WHEREAS, on September 25, 2015, the Court issued an Order Granting in Part and Denying in
10 Part Defendants’ Motion to Dismiss and Motion to Quash Re: Dkt. No. 8 [Dkt. No. 36], which granted
11 Defendants’ motion as to Defendants BDB Capital, Inc. (sued as Liquid Capital of Colorado) and Bruce
12 Dawson and denied the motion as to Mr. Roter;

13 WHEREAS, on September 25, 2015, the Court issued an Order Granting Defendant’s Motion to
14 Dismiss Re: Dkt. No. 9 [Dkt. No. 37], which dismissed all claims against Defendant Liquid Capital
15 Exchange, Inc., with leave to amend;

16 WHEREAS, the Court’s September 25, 2015 Orders [Dkt. Nos. 36 and 37] require Plaintiff to file
17 any amended complaint in response to the Orders on or before October 12, 2015;

18 WHEREAS, pursuant to Federal Rule of Civil Procedure Rule 12(a)(4), Mr. Roter’s pleading in
19 response to Plaintiff’s Complaint is presently due on October 9, 2015;

20 WHEREAS, Plaintiff has advised Defendants that it intends on filing an Amended Complaint;
21 and

22 WHEREAS, the Parties agree to extend the date on which Mr. Roter’s response to the Complaint
23 is due to the date on which Defendants’ response to Plaintiff’s Amended Complaint is due.

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1 THEREFORE, IT IS HEREBY STIPULATED by and between the parties to the above-entitled
2 action, through their respective counsel, that the date on which Defendant Sol Roter's response to the
3 Complaint is due is extended to the date on which Defendants' response to Plaintiff's Amended
4 Complaint is due.

5 DATED: October 8, 2015

GREENBERG TRAURIG, LLP

6
7 By /s/ William J. Goines

William J. Goines

Jon L. Swergold

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9 Attorneys for Defendants Liquid Capital Exchange, Inc.,
10 BDB Capital, Inc. (d/b/a Liquid Capital of
11 Colorado)(erroneously sued as Liquid Capital of Colorado),
Sol Roter, an Individual, and Bruce Dawson, an Individual

12 DATED: October 8, 2015

DUANE MORRIS LLP

13
14 By /s/ Denis F. Shanagher

Denis F. Shanagher

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16 Attorneys for Plaintiff Marble Bridge Funding Group, Inc.
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1 **ATTESTATION CLAUSE**

2 I, William J. Goines, am the ECF User whose ID and password are being used to file this
3 STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT. In compliance with Civil
4 L.R. 5-1(i), I hereby attest that Denis F. Shanagher, attorney at Duane Morris LLP, concurred in this
5 filing.

6
7 DATED: October 8, 2015

GREENBERG TRAURIG, LLP

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9 By: /s/ William J. Goines

10 William J. Goines
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