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7 Attorneys for Defendant
 APPLE INC.

8
 9 UNITED STATES DISTRICT COURT
 10 SOUTHERN DISTRICT OF CALIFORNIA
 11

12 DAVID WALSH, an individual, on behalf
 13 of himself, and on behalf of all persons
 similarly situated,
 14 Plaintiff,
 15
 v.
 16 APPLE INC.; and DOES 1-10,
 17 Defendants.
 18

CASE NO. 08 CV 1410 JM POR
 JOINT MOTION FOR EXTENSION OF
 TIME TO RESPOND TO COMPLAINT

Judge: Hon. Jeffrey T. Miller

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendant Apple Inc. ("Apple") and Plaintiff David Walsh hereby move for an extension of time
3 and respectfully request that the Court grant a fourteen (14) day extension and set a date of September
4 11, 2008, for Apple to respond to the Complaint. Good cause exists to grant this motion on the
5 following grounds:

- 6 1. No previous applications for an extension of time has been made;
- 7 2. Apple recently retained counsel in this action, and counsel needs a brief extension
8 of time to familiarize themselves with the facts and prepare a responsive pleading;
- 9 3. Counsel for Plaintiff has agreed to the requested extension of time;
- 10 4. The parties agree that they will not be prejudiced by the Court's issuing an Order
11 approving this Joint Motion;
- 12 5. The requested extension will not impact any trial or other deadlines in the case;
- 13 and
- 14 6. The parties are not aware of any exigent circumstances attendant with this
15 proceeding that would justify the Court withholding its approval of this Joint Motion.

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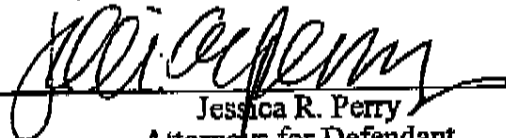
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1 THE PARTIES HEREBY JOINTLY MOVE that Apple be granted a fourteen (14) day extension
 2 to file a response to the Complaint, making Apple's new deadline to respond to the Complaint on
 3 September 11, 2008.

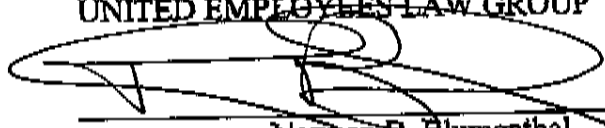
4 Dated: August 26, 2008

5 LYNNE C. HERMLE
 6 JOSEPH C. LIBURT
 7 JESSICA R. PERRY
 8 ORRICK, HERRINGTON & SUTCLIFFE LLP

9 
 10 _____
 11 Jessica R. Perry
 12 Attorneys for Defendant
 13 Apple Inc.

14 Dated: August 26, 2008

15 NORMAN B. BLUMENTHAL
 16 KYLE R. NORDREHAUG
 17 APARAJIT BHOWMIK
 18 BLUMENTHAL & NORDREHAUG

19 WALTER HAINES
 20 UNITED EMPLOYEES LAW GROUP
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 23 Norman B. Blumenthal
 24 Attorneys for Plaintiff
 25 David Walsh

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15 v.

16 APPLE INC.; and DOES 1-10,

17 Defendants.

CASE NO. 08 CV 1410 JM POR

**[PROPOSED] ORDER GRANTING JOINT
 MOTION FOR EXTENSION OF TIME TO
 RESPOND TO COMPLAINT**

Judge: Hon. Jeffrey T. Miller

19
 20 Pursuant to the joint motion and stipulation by and between Defendant Apple Inc. ("Apple") and
 21 Plaintiff David Walsh, and good cause appearing therefor, the time in which Apple is required to
 22 respond to the Complaint is hereby extended until September 11, 2008.

23 IT IS SO ORDERED.

24
 25 Dated: _____
 26

27 _____
 United States District Court Judge