

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Du Daobin, et al.)	
)	
)	
)	
Plaintiff,)	Civil Action No. 8:11-cv-01538 PJM
)	
v.)	
)	
CISCO Systems, Inc., et al.)	
)	
)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT¹**

The parties to the above-captioned matter, by and through their undersigned counsel, submit the following Joint Motion For Extension Of Time To Respond To The Complaint.

WHEREAS, Plaintiffs’ Complaint implicates complex issues of international law and domestic law, including under the Alien Tort Statute and Torture Victim Protection Act; and

WHEREAS, Defendants intend to seek a stay of their response to the Complaint, and of further progress in this action, pending (a) the disposition of Defendants’ motion to dismiss the complaint in Doe v. Cisco, No. 5:11-cv-02449 (N.D. Cal.) and (b) a decision by the Fourth Circuit Court of Appeals in Aziz v. Alcolac, No. 10-1908; and

WHEREAS, Plaintiffs oppose Defendants’ requested stay; and

WHEREAS, the Parties have agreed to adjourn Defendants’ response to the Complaint pending this Court’s resolution of Defendants’ request for a stay;

NOW, THEREFORE, the Parties stipulate and jointly move the Court to enter an Order stating as follows:

1. If this Court denies Defendants’ request for a stay, then the Defendants shall respond to the Complaint within 30 days of such Order.
2. If this Court grants Defendants’ request for a stay in any respect, then the Defendants shall respond to the Complaint within 30 days of the expiration of such a stay.

¹ By consent motion of the parties, the deadline for all Defendants to answer or otherwise respond to the Complaint was previously extended to July 25, 2011.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing was served electronically via ECF to the following:

Daniel S. Ward
WARD & WARD, P.L.L.C.
2020 N. St., NW
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Counsel for Plaintiff

_____/s/_____
Lincoln O. Bisbee

Counsel for Defendant