

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Brian Zard, on behalf of himself
and other individuals similarly situated,

Plaintiff,

v.

Groupon, Inc., a Delaware Corporation,

Defendant.

Civil Action No.: 11-cv-00605 PAM/FLN

STIPULATION TO EXTEND TIME

The undersigned parties through their respective attorneys hereby stipulate and agree as follows:

1. On or about March 8, 2011, Plaintiff filed a Complaint in this Court against Groupon, Inc..
2. On or about March 15, 2011, Groupon was served with the Complaint.
3. The time for Defendant to answer or otherwise respond to the Complaint is April 5, 2011, pursuant to Fed. R. Civ. P. 12.
4. On or about March 11, 2011, plaintiffs in two other actions against Groupon¹ filed with the Judicial Panel on Multidistrict Litigation a motion to transfer this case, along with eight other cases to the Northern District of California.

¹ *Ferreira v. Groupon, Inc.*, No. 11-cv-0132-DMS(POR) (S.D. Cal. filed Jan. 21, 2011) and *Gosling v. Groupon, Inc.*, No. 11-cv-01038-CRB (N.D. Cal. filed Mar. 4, 2011).

5. In light of these developments, the parties have agreed to extend the time for Defendant to answer or otherwise respond to the Complaint an additional 30 days to Thursday, May 5, 2011.

6. The parties would like to formally acknowledge their agreement and hereby stipulate and agree that Defendant shall have an extension of time until May 5, 2011 to answer or otherwise respond to the Complaint.

IT IS SO STIPULATED.

Stipulated to:

Date: March 24, 2011

By: s/Myles A. Schneider
Myles A. Schneider, Bar No. 305479
MYLES A. SCHNEIDER & ASSOC., LTD.
710 Dodge Avenue NW, Suite A
Elk River, MN 55330
Telephone: (763) 315-1100
Facsimile: (877) 294-4254
myles@maschneider.com

Andrew S. Friedman
Elaine A. Ryan
Patricia N. Syverson
BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, P.C.
2901 N. Central Avenue, Suite 1000
Phoenix, AZ 85012
Telephone: (602) 274-1100
Facsimile: (602) 274-1199

Todd D. Carpenter
BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, P.C.
600 W. Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 756-6978
Facsimile: (619) 798-5860

Attorneys for Plaintiff Brian Zard

Date: March 24, 2011

By: s/Jarod M. Bona
Jarod M. Bona, Bar No. 388860
DLA PIPER LLP (US)
90 South Seventh Street, Suite 5100
Minneapolis, MN 55402
Telephone: (612) 524-3000
Facsimile: (612) 524-3001
jarod.bona@dlapiper.com

Shirli F. Weiss
Christopher M. Young
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101
Telephone: (619) 699-2700
Facsimile: (619) 699-2701
shirli.weiss@dlapiper.com
christopher.young@dlapiper.com

Attorneys for Defendant Groupon, Inc.

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