

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

MARC BRAGG, ESQ., an individual

No. 06-cv-4925

Plaintiff

v

LINDEN RESEARCH, INC., a corporation,  
and PHILIP ROSEDALE, an individual,

Defendants.

**JOINT STIPULATION PROVIDING AN EXTENSION OF TIME REGARDING  
PLAINTIFF'S RESPONSE TO MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION BY PHILIP ROSEDALE AND DEFENDANTS' MOTION TO  
COMPEL ARBITRATION**

AND NOW, come THE PARTIES, by and through undersigned counsel, and files the following stipulation extending Plaintiff's deadlines to respond to Motion to Dismiss for Lack of Personal Jurisdiction by Philip Rosedale and Defendants' Motion to Compel Arbitration, as follows:

1. Defendants removed this case to Federal Court on or about November 7, 2006.
2. Defendants jointly filed a Motion to Compel Arbitration on or about November 14, 2006.
3. Defendant Rosedale filed a Motion to Dismiss for Lack of Personal Jurisdiction pursuant to F.R.C.P. 12(b)(2) on or about November 14, 2006.
4. Plaintiff filed a Motion to Remand on or about November 20, 2006.
5. The parties recognize and agree that should Motion to Remand be granted, this Court will not have jurisdiction to decide the other Motions filed by Defendants. Further, the parties recognize and agree that should the Motion to Remand be denied, this Court will have

jurisdiction to decide the Motions filed by the Defendants. Neither party is waiving any rights to appeal associated with rulings on any of the aforementioned motions.

6. Accordingly, as it serves the interests of justice, Defendants hereby provide Plaintiff with an extension of time in which to respond to the Motion to Dismiss and Motion to Compel Arbitration pursuant to Local Rule 7.4. Should the Court deny Plaintiff's Motion to Remand, Plaintiff shall file his responses to the two outstanding motions within seven (7) days after the Court denies such motion.

7. No prior extension has been granted or stipulated.

Respectfully submitted,

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