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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

WANG XIAONING, YU LING, SHI TAO,
and ADDITIONAL PRESENTLY
UNNAMED AND TO BE IDENTIFIED
INDIVIDUALS,

Plaintiff,

v.

YAHOO, INC., a Delaware Corporation,
YAHOO! HOLDINGS (HONG KONG),
LTD., a Foreign Subsidiary of Yahoo!,
ALIBABA.COM, INC. a Delaware
Corporation, AND OTHER PRESENTLY
UNNAMED AND TO BE IDENTIFIED
INDIVIDUAL EMPLOYEES OF SAID
CORPORATIONS,

Defendant.

Case No. C07-02151 CW

**JOINT STIPULATED REQUEST FOR
ORDER ENLARGING TIME TO
RESPOND TO COMPLAINT AND
EXTENDING INITIAL DEADLINES;
ORDER; DECLARATION OF DANIEL
PETROCELLI**

RECITALS

WHEREAS, defendant Yahoo!, Inc. (“Yahoo!”) was served with the summons and Amended Complaint for Tort Damages in this case on May 30, 2007 (“Amended Complaint”), and its response is due June 19, 2007;

WHEREAS, defendant Alibaba.com, Inc. was served with the summons and Amended Complaint in this case on May 31, 2007, and its response is due June 20, 2007;

WHEREAS, there is a dispute whether specially appearing defendant Yahoo! Holdings (Hong Kong) Ltd.—which changed its name, in 2006, to Yahoo! Hong Kong Limited (“YHKL”)—was served with the summons and Amended Complaint in this case and whether it is required to file any response;

WHEREAS, Daniel Petrocelli, lead trial counsel for Yahoo! has a long-standing family vacation to travel out of the country, which is scheduled to begin July 1 and end July 22;

WHEREAS, no previous extensions of time have been sought in this case;

STIPULATION

WHEREAS, NOW THEREFORE, the parties hereby stipulate and jointly request that:

(1) YHKL be permitted to agree to waive service in this case pursuant to Federal Rule of Civil Procedure 4(d), without any prejudice to its ability to move to dismiss this case for lack of personal jurisdiction;

(2) the date for defendants to respond to the Amended Complaint be enlarged—pursuant to Federal Rule of Civil Procedure 6 and Civil Local Rule 6-2—from the respective dates mentioned above to July 27, 2007 for all defendants;

(a) plaintiffs’ reply to the defendants’ response to the Amended Complaint and to any Motions therein be due August 27, 2007;

(b) any reply briefs filed by defendants in support of their motions be due September 14, 2007;

(3) the deadlines set forth in the Court’s April 18, 2007 Order Setting Initial Case Management Conference And ADR Deadlines be extended as follows:

(a) the last day to meet and discuss initial disclosures, early settlement, ADR, and

Dated: June 18, 2007

JOSEPH P. CYR, ESQ.
LOVELLS LLP

By: _____ /S/ (with permission)
Joseph P. Cyr, Esq.
Attorneys for Defendant ALIBABA.COM,
INC.

ORDER

PURSUANT TO STIPULATION, it is so ORDERED.

19th June

SIGNED on the _____ day of _____, 2007.



The Honorable Claudia Wilken
Judge, United States District Court
for the Northern District of California