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9 ALLERGAN, INC. and ALLERGAN
10 SALES, LLC
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20 Attorneys for Defendants
21 Ferrum Ferro Capital, LLC and Kevin
22 Barnes
23 (Additional counsel listed on signature
24 page)

25 **UNITED STATES DISTRICT COURT**
26 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
27 **SOUTHERN DIVISION**

28 ALLERGAN, INC., ALLERGAN
SALES, LLC,

Plaintiffs,

v.

FERRUM FERRO CAPITAL, LLC;
KEVIN BARNES,

Defendants.

Case No. SACV 15-00992 JAK (PLAx)

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO INITIAL COMPLAINT BY NOT
MORE THAN 30 DAYS (L.R. 8-3)**

Complaint Served: June 24 and June 29,
2015

Current Response Dates: July 15 and July
20, 2015

New Response Date: August 10, 2015

Complaint Filed: June 19, 2015

Judge: Hon. John A. Kronstadt

1 On June 19, 2015, Plaintiffs Allergan, Inc. and Allergan Sales, LLC
2 (collectively, “Allergan”) filed suit against Defendants Ferrum Ferro Capital, LLC
3 (“FFC”) and Kevin Barnes (“Barnes”) (collectively “Defendants”) in the United
4 States District Court for the Central District of California alleging, *inter alia*,
5 attempted civil extortion, unfair competition, and malicious prosecution.

6 On June 24, 2015, Allergan served the complaint on Defendant FFC.

7 On June 28, 2015, Defendant Barnes’s undersigned counsel agreed to accept
8 service of the complaint on behalf of Defendant Barnes. On June 29, 2015, Allergan
9 served the complaint on Mr. Barnes’s undersigned counsel.¹

10 The deadline for FFC to answer or otherwise respond to the complaint is
11 currently July 15, 2015. The deadline for Barnes to answer or otherwise respond to
12 the complaint is currently July 20, 2015.

13 The Parties hereby stipulate to extend until August 10, 2015, the time for
14 Defendants to answer or otherwise respond to complaint.

15 **SO STIPULATED.**

16
17 Dated: July 6, 2015

Respectfully Submitted
FISH & RICHARDSON P.C.

18 By: */s/ Michael A. Amon*

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¹ Randazza Legal Group is representing both Defendants FFC and Mr. Barnes in this litigation.

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Attorneys for Plaintiff Allergan, Inc., and
Allergan Sales, LLC

Dated: July 6, 2015

Respectfully Submitted

By: */s/ D. Gill Sperlein*

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Attorney for Defendants Ferrum Ferro
Capital, LLC and Kevin Barnes

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 6, 2015 to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system per Civ. L.R. 5-3.2.2. Any other counsel of record will be served by electronic mail.

The following individuals have been served additionally via electronic mail:

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/s/ Michael A. Amon
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