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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 JANE DOE I, *et al.*, )  
18 )  
19 Plaintiffs, )  
20 v. )  
21 LIU QI, *et al.*, )  
22 Defendants. )

No. **C-02-0672 CW (EMC)**  
No. **C-02-0695 CW (EMC)**

**PLAINTIFFS' JOINT MOTION FOR  
EXTENSION OF TIME TO FILE  
OBJECTIONS TO MAGISTRATE  
JUDGE'S REPORT AND  
RECOMMENDATION AND MOTION  
FOR DE NOVO DETERMINATION**

23 PLAINTEFF A, *et al.*, )  
24 )  
25 Plaintiffs, )  
26 v. )  
27 XIA DEREN, *et al.*, )  
28 Defendants. )

**Motion for Extension of Time**

1

*Doe v. Liu Qi, No. C-02-0672 CW (EMC), Plaintiff A v. Deren, No C-02-0695 CW (EMC)*

1 Plaintiffs in the above related cases respectfully submit this joint motion for an extension of  
2 time to file objections to the Magistrate Judge’s Report and Recommendation and a motion for a *de*  
3 *novο* determination, pursuant to Local Rule 6-3, on the following grounds:

4 Magistrate Judge Edward Chen filed an 89-page Report and Recommendation Regarding  
5 Plaintiffs’ Motion for Entry of Default Judgment (“Report”) in these cases on June 11, 2003.  
6 Magistrate Chen’s Report addresses a wide range of complex issues, including the application of  
7 the Foreign Sovereign Immunities Act and act of state doctrine and issues surrounding the court’s  
8 jurisdiction over plaintiffs’ human rights claims. According to Local Rule 72-2, (and Federal Rule  
9 of Civil Procedure 72(b) and 28 U.S.C. section 636(b)(1)), plaintiffs have just 10 days to file a  
10 response. Due to the complexity and number of issues raised, and the length of the Magistrate  
11 Judge’s decision, plaintiffs jointly request a thirty-day extension for filing their objections and  
12 motion for *de novo* determination, from the original due date of June 25, 2003, to July 25, 2003.  
13  
14  
15  
16

17 Dated: June 18, 2003

Respectfully submitted,

21 /s/  
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26 *Qi, et al.*

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