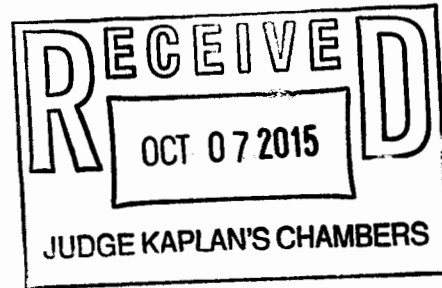


Kaplan, J.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE STATE OF NEW YORK,

ex rel.

ERIC RASMUSEN,

Plaintiff,

vs.

CITIGROUP, INC.

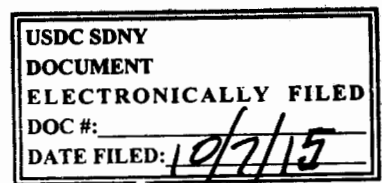
Defendant.

Case No. 15-cv-7826 (LAK)

Removed from:

Supreme Court of the State of New York,
County of New York

Index No. 100175/2013



STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS, Plaintiff Eric Rasmusen filed a summons and qui tam complaint (the "Summons and Complaint") in this action under seal in the Supreme Court of the State of New York, County of New York on January 24, 2013.

WHEREAS on May 13, 2015, the Complaint was unsealed.

WHEREAS on September 2, 2015, the Summons was unsealed so that Plaintiff could serve Defendant Citigroup Inc.

WHEREAS Plaintiff served the Summons and Complaint on the Secretary of State of the State of New York, who received them on September 3, 2015.

WHEREAS Defendant received a copy of the Summons and Complaint through its agent on September 11, 2015;

WHEREAS the Defendant's time to answer or move to dismiss the Summons and Complaint had not expired as of October 2, 2015, and Defendant had not yet served an answer or motion to dismiss;

WHEREAS on October 2, 2015, the Defendant removed this action to this Court;

WHEREAS Defendant has made no prior requests for extensions of time to answer or move to dismiss;

NOW THEREFORE, Plaintiff and Defendant hereby stipulate, through their attorneys of record, as follows:

1. Defendant shall respond to, answer, or move to dismiss Plaintiff's complaint on or before December 7, 2015;
2. Plaintiff shall file any papers in opposition to a motion to dismiss on or before February 5, 2016;
3. Defendant shall file any papers in reply to Plaintiff's opposition papers on or before March 18, 2016.
4. Nothing in this stipulation shall waive any procedural or substantive rights the parties may have.
5. This stipulation may be executed in one or more counterparts.

Dated: October 6, 2015
New York, New York


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Attorneys for Defendant Citigroup Inc.

IT IS SO ORDERED.

Dated

HON. LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

LM

Dated: October 6, 2015
New York, New York

HODGSON RUSS LLP

By: 

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Attorneys for Defendant Citigroup Inc.

IT IS SO ORDERED.


10/7/15
Dated

HON. LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE