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10 Attorneys for Plaintiff,  
 11 JASHA TULL



12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 OAKLAND DIVISION

15 JASHA TULL, an individual,  
 16 Plaintiff,  
 17 vs.  
 18 MICHAELA HIGGINS aka CAELI LA, an  
 19 individual; and DOES 1 through 10  
 20 inclusive,  
 21 Defendants.

CASE NO.: 4:21-cv-01566-DMR  
 ASSIGNED TO: Magistrate Judge Donna M. Ryu

**STIPULATION AND ORDER FURTHER  
 EXTENDING DEADLINE TO FILE FIRST  
 AMENDED COMPLAINT**

FILE DATE: March 5, 2021  
 TRIAL DATE SET: No Date Set

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 23  
 24 **STIPULATION**

25 WHEREAS, on March 5, 2021, Plaintiff Jasha Tull (“Plaintiff”) filed his complaint in this  
 26 action (Dkt. 1);

27 WHEREAS, on April 28, 2021, Defendant Michaela Higgins filed a motion to dismiss  
 28 and motion to strike the complaint (“Motions”) (Dkt.24 and 25);

1 WHEREAS, on December 27, 2021, the Court issued an Order on Motions to Dismiss and  
 2 Motions to Strike (“Order”) which granted in part and denied in part the Motions with leave to  
 3 amend and further ordered that Plaintiff shall file an amended complaint within 14 days of the  
 4 Court’s Order (Dkt. 40);

5 WHEREAS, on January 7, 2022, this Court approved the parties’ joint request for an  
 6 extension to file a first amended complaint and issued an Order extending the deadline for  
 7 Plaintiff to file an amended complaint until January 24, 2022 (Dkt. 44);

8 WHEREAS, on January 6, 2022, Plaintiff’s counsel filed their Notice of Withdrawal and  
 9 Substitution of Counsel (Dkt. 42) and on January 20, 2022, the Court issued an order granting *pro*  
 10 *hac vice* admission to Plaintiff’s counsel Jacqueline Veit (Dkt. 47);

11 WHEREAS, on January 21, 2022, the parties submitted a Stipulation and Order Extending  
 12 Deadline to File First Amended Complaint (Dkt. 48) requesting a further extension of 30 days to  
 13 file an amended complaint, which was approved by the Court, thereby extending the deadline for  
 14 Plaintiff to file an amended complaint until February 23, 2022 (Dkt. 49);

15 WHEREAS, on February 18, 2022, the parties submitted a Stipulation and Order  
 16 Extending Deadline to File First Amended Complaint (Dkt. 50), advising the Court that the  
 17 parties are actively engaged in settlement discussions and progress has been made but certain  
 18 complicated issues exist that remain to be addressed, which was approved by the Court, thereby  
 19 extending the deadline for Plaintiff to file an amended complaint until March 18, 2022 (Dkt. 51);

20 WHEREAS, on March 18, 2022, the parties submitted a Stipulation and Order Extending  
 21 Deadline to File First Amended Complaint (Dkt. 52), advising the Court that the parties have  
 22 continued settlement efforts and are close to settlement and have exchanged initial settlement  
 23 documents, which was approved by the Court, thereby extending the deadline for Plaintiff to file  
 24 an amended complaint until March 30, 2022 (Dkt. 53);

25 WHEREAS, on March 30, 2022, the parties submitted a Stipulation and Order Extending  
 26 Deadline to File First Amended Complaint (Dkt. 54), advising the Court that the parties have not  
 27 yet finalized settlement documents but continue to work toward that goal, which was approved by  
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Dated: April 6, 2022  
  
  
  
Dated: April 6, 2022

GREENBERG GROSS LLP  
  
By: /s/ Deborah Susan Mallgrave  
Deborah Susan Mallgrave  
Attorney for Defendant MICHAELA  
HIGGINS  
  
GIBBS LAW GROUP LLP  
  
By: /s/ Karen Barth Menzies  
Karen Barth Menzies  
Co-counsel for Defendant MICHAELA  
HIGGINS

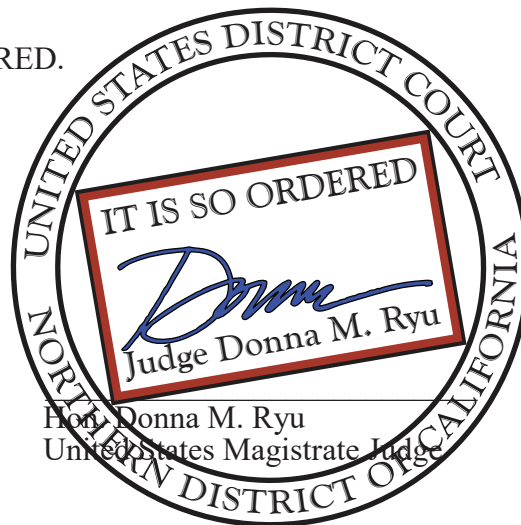


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**ORDER**

Pursuant to Stipulation, it is SO ORDERED.

DATED: April 6, 2022



Hon. Donna M. Ryu  
United States Magistrate Judge

**NEWMAYER  
DILLION**

