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12 Attorneys for Defendant, IC KANG CORPORATION

13 **UNITED STATES DISTRICT COURT**  
14 **EASTERN DISTRICT OF CALIFORNIA**  
15

16 CONNIE ARNOLD, ) Case No.: 1:08-CV-01246-AWI-DLB  
17 )  
Plaintiff, ) **Civil Rights**  
18 vs. ) *Assigned to Honorable Anthony W. Ishii, Judge*  
19 ) *presiding*  
20 LA QUINTA CORPORATION, ) **STIPULATION FOR EXTENSION TO FILE**  
21 ) **A MOTION FOR ATTORNEYS' FEES,**  
Defendants. ) **LITIGATION EXPENSES AND COSTS**  
22 )  
\_\_\_\_\_ )

23 On or about January 31, 2011, Plaintiff CONNIE ARNOLD and Defendant IC KANG  
24 CORPORATION submitted to this Court a fully executed Consent Decree and [Proposed] Order for  
25 Settlement of Plaintiff's Claims for Damages as Against Defendant IC Kang Corporation. This  
26 Court executed the Order on February 12, 2011. (Docket #66).

27 The Consent Decree and Order provide "The actual amount of the reasonable attorneys'  
28 fees, litigation expenses and costs to be paid by La Quinta to Plaintiff's counsel shall be determined

1 through a settlement between the parties hereto or by the Court through a Motion for an Award of  
2 Attorneys' Fees, Litigations Expenses and Costs." (Docket #66, 3:24-27).

3 The Consent Decree and Order further provides that if a motion is required to determine the  
4 amount of attorneys' fees, litigation expenses and costs, such motion would have to be "filed by  
5 Plaintiff's counsel no later than ninety (90) days of the Court's execution of the [Proposed]  
6 Order..." (Docket #66, 5:8-13).

7 The parties hereto desire to attempt to settle the issue of attorneys' fees, litigation expenses  
8 and costs due Plaintiff's counsel to the extent possible, as opposed to incurring additional attorneys'  
9 fees, expenses and costs to file a motion and prepare for a hearing.

10 The parties have been in settlement discussions, but have been unable to get a response from  
11 Defendant's insurance carrier, but have agreed to continue to do so.

12 The parties desire to extend the time by which Plaintiff's counsel must file a Motion for an  
13 Award of Attorneys' Fees, Litigation Expenses and Costs for an additional sixty (60) days, so that  
14 the parties can continue to attempt to settle the attorneys' fees, litigation expenses and costs portion  
15 of this matter.

16  
17 **IT IS SO STIPULATED.**

18 Dated: April 27, 2011

**BARBOSA, METZ & HARRISON, LLP**

19  
20 By:           /s/ Jeff A. Harrison            
21 PATRICIA BARBOSA, Esq.  
22 JEFF A. HARRISON, Esq.  
Attorneys for Plaintiff, CONNIE ARNOLD

23 Date: April 27, 2011

**BASHAM LAW GROUP**

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25 By:           /s/ Gary Basham            
26 GARY R. BASHAM, Esq.  
27 Attorneys for Defendant, IC KANG  
CORPORATION

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**ORDER**

Pursuant to Joint Stipulation of Plaintiff, CONNIE ARNOLD and Defendant, IC KANG CORPORATION, this Court hereby Orders as follows:

The deadline to file a Motion for an Award of Attorneys' Fees, Litigation Expenses and Costs is continued from May 13, 2011 to July 12, 2011.

IT IS SO ORDERED.

Dated: May 3, 2011

  
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CHIEF UNITED STATES DISTRICT JUDGE