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6 Attorneys for Defendants
7 SA RECYCLING LLC (erroneously sued as
“S.A. RECYCLING”) and SIMS METAL
8 MANAGEMENT (erroneously sued as “SIMMS
METAL MANAGEMENT”)
9

10 W. Rod McClelland, Jr., Esq. (State Bar No. 179771)
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13 Attorneys for Plaintiff
14 ED EDGAR

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17

18 ED EDGAR,

19 Plaintiff,

20 vs.

21 S.A. RECYCLING, SIMMS METAL
22 MANAGEMENT, S.A. RECYCLING
AND/OR SIMMS METAL
23 MANAGEMENT DBA GOLDEN STATE
METALS and DOES 1 TO 25, inclusive,

24 Defendants.
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CASE NO.: 1:10-CV-00346-LJO-DLB

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF’S COMPLAINT**

Complaint Filed: February 26, 2010

1 **WHEREAS**, on March 10, 2010, Plaintiff Ed Edgar (“Plaintiff”) served upon
2 Defendants SA Recycling LLC (erroneously sued herein as “S.A. Recycling”) and Sims
3 Metal Management (erroneously sued herein as “Simms Metal Management”)
4 (collectively, “Defendants”) a Complaint for Compensatory and Punitive Damages
5 (“Complaint”) in this action;

6 **WHEREAS**, Defendants’ deadline for filing and serving a response to Plaintiff’s
7 Complaint is March 31, 2010;

8 **WHEREAS**, counsel for Defendants only recently was retained, on March 29,
9 2010, and requires additional time to evaluate Plaintiff’s Complaint;

10 **WHEREAS**, with good cause therefor, Plaintiff and Defendant (collectively, the
11 “Parties”) wish to and hereby do stipulate to extend the time within which Defendants
12 must file and serve a response to Plaintiff’s Complaint by fourteen (14) calendar days, to
13 and including April 14, 2010. *See* EDCA Local Rule 144.

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1 **IT IS HEREBY STIPULATED** by and between the Parties, by and through their
2 respective attorneys of record, that the time within which Defendants SA Recycling LLC
3 and Sims Metal Management must answer or otherwise respond to Plaintiff Ed Edgar's
4 Complaint is extended by fourteen (14) calendar days, to and including April 14, 2010.

5 **IT IS SO STIPULATED.**

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7 Dated: March 29, 2010

JACKSON LEWIS LLP

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9 By: /s/ Thomas G. Mackey

10 Thomas G. Mackey
11 Jennifer B. Hodur

12 Attorneys for Defendants,
13 SA RECYCLING LLC (erroneously sued
14 herein as "S.A. RECYCLING") and SIMS
15 METAL MANAGEMENT (erroneously
16 sued herein as "SIMMS METAL
17 MANAGEMENT")

18 Dated: March 29, 2010

McCLELLAND LAW OFFICES, APC

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20 By: /s/ W. Rod McClelland, Jr.

21 W. Rod McClelland, Jr.

22 Attorneys for Plaintiff,
23 ED EDGAR

24 IT IS SO ORDERED.

25 Dated: March 31, 2010

/s/ Dennis L. Beck

26 UNITED STATES MAGISTRATE JUDGE
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