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14 WILLIAM PARDINI, AND B.T.B., INC.

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17 FRESNO DIVISION

18 CREDIT BUREAU CONNECTION, INC.,

19 Plaintiff,

20 v.

21 WILLIAM PARDINI, B.T.B., INC., d.b.a.
22 DATA CONSULTANTS,

23 Defendants.

CASE NO. 1:10-CV-01202-LJO-GSA

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

(LOCAL RULE 144)

JURY TRIAL DEMANDED

Judge: The Honorable Lawrence J. O'Neil

Hearing: TBD

Time: TBD

Action Filed: July 1, 2010

1 Pursuant to, and in accordance with, Local Rule 144, Plaintiff Credit Bureau Connection,
2 Inc. (“CBC”), and Defendants William Pardini (“William Pardini”) and B.T.B. Inc., d/b/a Data
3 Consultants (“Data Consultants”), by and through their respective counsel, hereby stipulate to an
4 extension of time – until Wednesday, August 18, 2010 – for Defendants William Pardini and
5 B.T.B Inc., d/b/a Data Consultants (hereinafter, “Data Consultants”) to file a response to
6 Plaintiff’s Complaint (Docket Entry (hereinafter, “D.E.”), 1), which was filed on July 1, 2010.
7

8 **RECITALS**

9 1. On July 1, 2010, Plaintiff CBC filed a Complaint alleging Breach of Fiduciary
10 Duty, Unfair Business Practices, Intentional and Negligent Interference with Existing and
11 Prospective Economic Advantage, Conversion, Unjust Enrichment, Accounting, Injunctive
12 Relief, Copyright Infringement, Breach of Contract, Declaratory Relief, and demanding a jury
13 trial (“Complaint”). (D.E. 1).

14 2. On July 2, 2010, Plaintiff served the Summons and Complaint in this action on
15 Defendant William Pardini by personal service (D.E. 13). This service occurred at 5:47 pm.

16 3. On July 6, 2010, Plaintiff served the Summons and Complaint in this action on
17 Defendant Data Consultants by substituted service on Linda Spadler, a person who was allegedly
18 “apparently in charge of the office, or place of business, at least 18 years of age, who was
19 informed of the general nature of the papers.” (D.E. 12).

20 4. On July 8, 2010, Defendants William Pardini and Data Consultants filed an
21 Opposition to Plaintiff’s *Ex Parte* Application for a Temporary Restraining Order and Order to
22 Show Cause Regarding Preliminary Injunction (“Opposition”). (D.E. 16).

23 5. All parties who have appeared in this action and are affected thereby have
24 stipulated and agreed that Defendants William Pardini and Data Consultants’ response to Plaintiff
25 CBC’s Complaint will be due no later than Wednesday, August 18, 2010, which is not more than
26 the twenty eight (28) day “initial stipulation extending time” provided for in Local Rule 144(a),
27 which can be filed without approval of the Court as long as the stipulation is signed on behalf of
28 all parties who have appeared in the action and are affected by the stipulation.

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6. On August 13, 2010, in a discussion with Magistrate Judge Beck, the parties agreed to extend the time for Defendants to answer the complaint in order to allow more time to negotiate a proposal regarding separating the businesses.

STIPULATION

WHEREFORE, PREMISES CONSIDERED, and pursuant to and in accordance with Local Rule 144, Plaintiff CBC, and Defendants William Pardini and Data Consultants, by and through their respective counsel, hereby stipulate that the response of Defendants William Pardini and Data Consultants to Plaintiff CBC's Complaint will be due no later than Wednesday, September 1, 2010.

Date: August 15, 2010

Respectfully submitted,

By: /s/ David A. Makman
David A. Makman

Attorney for Defendants
WILLIAM PARDINI, and B.T.B. INC.

By: /s/ Kristi Weiler Dean
Kristi Weiler Dean

Attorney for Plaintiff
CREDIT BUREAU CONNECTION, INC.

IT IS SO ORDERED.

Dated: August 18, 2010

 /s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE