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10 Attorneys for Defendant  
11 HG FOODS, LLC

12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

16 JESUS SOSA,

No. 1:10-CV-02196-OWW-SMS

17 Plaintiff,

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME OF 45 DAYS FOR  
DEFENDANT TO RESPOND TO  
COMPLAINT**

18 v.

Action Filed: November 24, 2010

19 HG FOODS, LLC. dba BURGER  
20 KING #3032, 1111 COUNTRY CLUB  
21 DRIVE, LLC,

22 Defendants.

23 Pursuant to Local Rules 6-143-144, Plaintiff Jesus Sosa and Defendant HG  
24 Foods, LLC, by and through their respective attorneys of record, Tanya Moore and Kurt  
25 A. Franklin of Hanson Bridgett LLP, along with Defendant 1111 Country Club Drive, LLC,  
26 state, agree and stipulate as follows:

27 1. No extension of time has been previously obtained.

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1                   2.    Counsel for Defendant HG Foods, LLC was retained last month and  
2 has been in discussions with Defendant 1111 Country Club Drive, LLC concerning their  
3 representation and responsive pleading. Upon being retained, counsel for Defendant HG  
4 Foods, LLC called Plaintiff's counsel. Now, the parties desire to explore early resolution.

5                   3. While Defendants deny wrongdoing, they anticipate having the  
6 Burger King restaurant that is the subject of this lawsuit reviewed for construction-related  
7 accessibility standards compliance by hiring a Certified Access Specialist (CASp) under  
8 Civil Code section 55.51. So that they can have a CASp report completed and focus on  
9 resolution efforts, the parties respectfully request that Defendants be granted forty-five  
10 (45) days from the signing of this order to file a responsive pleading to the Complaint.

11 IT IS SO STIPULATED effective as of January 12, 2011.

12 DATED: January 12, 2011

HANSON BRIDGETT LLP

14 By: S/ Kurt Franklin  
15 KURT A. FRANKLIN  
16 Attorneys for Defendant  
17 HG FOODS, LLC

13 DATED: January 12, 2011

By:/S/ Mark J. Weinstein  
1111 COUNTRY CLUB DRIVE, LLC  
Defendant

20 || DATED: January 12, 2011

MOORE LAW FIRM, P.C.

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By:/S/ Tanya Moore

TANYA MOORE  
Attorneys for Plaintiff  
JESUS SOSA

25 I, Kurt Franklin, hereby attest that I have on file all holographic signatures for any  
cc signatures indicated by a "conformed" signature ("S/") within this e-filed document.

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1                   **IT IS SO ORDERED:**

2                   Defendants HG FOODS, LLC and 1111 COUNTRY CLUB DRIVE, LLC shall file  
3 an Answer or other responsive pleading within forty-five (45) days of the date of this  
4 Order.

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7                   IT IS SO ORDERED.

8                   Dated: January 12, 2011

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10                   /s/ **Oliver W. Wanger**  
11                   UNITED STATES DISTRICT JUDGE

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