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7 Attorneys for: Defendants, COUNTRY FARE CAFÉ, INC.,
8 JOSE VALADEZ, TERESA VALADEZ

9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 KELLI LOSORWITH,
12 Plaintiff,
13 v.
14 COUNTRY FARE CAFÉ, INC., JOSE
15 VALADEZ, TERESA VALADEZ
16 Defendant(s).

Case No. 1:11-CV-00350-OWW-GSA

**STIPULATION FOR ORDER TO
CONTINUE TIME FOR DEFENDANTS
TO RESPOND TO COMPLAINT;
ORDER THEREON**

17 1. On or about March 14, 2011, Plaintiff, KELLI LOSORWITH (“Plaintiff”)
18 served her Complaint on Defendants, COUNTRY FARE CAFÉ, INC., JOSE VALADEZ,
19 TERESA VALADEZ (“Defendants”) making the response to the Complaint due on or before
20 April 12, 2011.

21 2. Thereafter, Defendants hired a Certified Access Specialist to inspect and
22 to prepare a CASp report on the property at issue. Counsel for Defendants requested an
23 additional 60-day extension of time to respond to the Complaint and to continue the Mandatory
24 Scheduling Conference for 60 days to permit Defendants to make the necessary modifications to
25 bring the property at issue into compliance with the ADA accessibility regulations and to permit
26 the parties to negotiate a settlement of the case. Plaintiff’s counsel agreed to permit Defendants
27 to serve and file its response to the Complaint on or before June 13, 2011.
28

1 3. Good cause exists for the extension of time to respond to the Complaint to
2 permit Defendants time to make the required modifications to the property to bring it into
3 compliance with the ADA, and to allow the parties time to negotiate a settlement of the case
4 thereby avoiding the necessity of proceeding to trial.

5 4. THEREFORE, IT IS HEREBY STIPULATED, by and between, Plaintiff
6 KELLI LOSORWITH and Defendants COUNTRY FARE CAFÉ, INC., JOSE VALADEZ,
7 TERESA VALADEZ, by and through their respective counsels of record, that Defendants may
8 have up to and including June 13, 2011, to serve and file their respective response to the
9 Complaint.

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11 DATED: April 12, 2011

JONES HELSLEY PC

12
13 By: /s/ Michael S. Helsley
14 Michael S. Helsley, Esq.,
15 Attorneys for Defendants,
16 COUNTRY FARE CAFÉ, INC.,
17 JOSE VALADEZ, TERESA VALADEZ

18
19 DATED: April 12, 2011.

MOORE LAW FIRM, P.C.

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21 By: /s/ Tanya Levinson Moore, Esq.
22 Tanya Levinson Moore, Esq.
23 Attorneys for Plaintiff
24 KELLI LOSORWITH

ORDER

25 Good cause appearing, IT IS HEREBY ORDERED that Defendants have up to
26 and including June 13, 2011 to serve and file their response to the Complaint.

27 IT IS SO ORDERED.

28 Dated: April 13, 2011

/s/ OLIVER W. WANGER
United States District Judge