

1 CHARLES K. BRUNN, SBN 28021
2 MAHANVIR S. SAHOTA, SBN 245501
3 LAW OFFICES OF BRUNN & FLYNN
4 A Professional Corporation
5 928 – 12th Street, Suite 200
6 Modesto, CA 95354
7 Telephone: (209) 521-2133
8 Facsimile: (209) 521-7584

9 Attorneys for Plaintiffs,
10 STANISLAUS TOWING & RECOVERY SERVICES, INC., (a California Corporation),
11 RON HANNINK and STEPHANIE HANNINK

12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF CALIFORNIA – FRESNO FACILITY**

14 STANISLAUS TOWING & RECOVERY
15 SERVICES, INC., (a California Corporation),
16 RON HANNINK and STEPHANIE HANNINK

Case No. 1:11-CV-01344-LJO-DLB

Plaintiff,

v.

CITY OF MODESTO, KAREN ROBERTSON
and DOES 1 – 50, inclusive,

Defendant.

**STIPULATION THAT REQUESTS FOR
ADMISSIONS NOT BE DEEMED
ADMITTED**

17 The parties whose counsel sign this document stipulate as follows for the purposes of this
18 proceeding:

19 1. Plaintiff RON HANNINK, whose responses to Defendant, CITY OF MODESTO’s, First
20 Set of Request for Admissions were due March 19, 2012, shall have until April 2, 2012 , to serve on the
21 undersigned counsel for Defendants the responses to this discovery demand.

22 2. The First Set of Requests for Admissions shall not be deemed admitted for the failure to
23 provide responses on March 19, 2012.

24 MEYERS, NAVE, RIBACK, SILVER & WILSON

25 Dated: March 27, 2012

By: _____ /S/

26 Tricia L. Hynes
27 Attorney for Defendants,
28 CITY OF MODESTO and
KAREN ROBERTSON

