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10 Attorneys for Defendants
11 CALAVERAS COMMUNICATIONS COMPANY,
12 SEBASTIAN ENTERPRISES, INC.,
13 VOLCANO COMMUNICATIONS COMPANY,
14 STAGELINE COMMUNICATIONS, INC.,
15 THE PONDEROSA TELEPHONE COMPANY,
16 SIERRA TEL COMMUNICATIONS GROUP,
17 VARNET, INC., CAL-ORE TELEPHONE CO.,
18 DUCOR TELEPHONE COMPANY and
19 CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.

20 UNITED STATES DISTRICT COURT
21 EASTERN DISTRICT OF CALIFORNIA

22 MP MEXLEVEL OF CALIFORNIA, INC.,

23 Plaintiff,

24 v.

25 CVIN, LLC dba VAST NETWORKS,
26 CALAVERAS COMMUNICATIONS
27 COMPANY, SEBASTIAN ENTERPRISES,
28 INC., VOLCANO COMMUNICATIONS
COMPANY, STAGELINE
COMMUNICATIONS, INC., THE
PONDEROSA TELEPHONE COMPANY,
SIERRA TEL COMMUNICATIONS GROUP,
VARNET, INC., CAL-ORE TELEPHONE
CO., DUCOR TELEPHONE COMPANY,
CONSOLIDATED COMMUNICATIONS
HOLDINGS, INC., THE CORPORATION
FOR EDUCATION NETWORK INITIATIVES
IN CALIFORNIA, and DOES 1 to 500,

Defendants.

Case No. 1:14-cv-00288 LJO GSA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR MEMBER
DEFENDANTS TO FILE RESPONSIVE
PLEADING TO SECOND AMENDED
COMPLAINT**

[Local Rule 144]

Original response date: August 14, 2014

Proposed extension: August 22, 2014

Complaint Filed: Feb. 28, 2014

Trial Date: Not Set

1 Defendants CALAVERAS COMMUNICATIONS COMPANY, SEBASTIAN
2 ENTERPRISES INC., VOLCANO COMMUNICATIONS COMPANY, STAGELINE
3 COMMUNICATIONS, INC., THE PONDEROSA TELEPHONE COMPANY, SIERRA TEL
4 COMMUNICATIONS GROUP, VARNET, INC., CAL-ORE TELEPHONE CO., DUCOR
5 TELEPHONE COMPANY and CONSOLIDATED COMMUNICATIONS HOLDINGS, INC.,
6 (collectively the “Member Defendants”) and plaintiff MP Nexlevel of California, Inc. (“Plaintiff”)
7 stipulate as follows:

8 WHEREAS, following order of the Court (Doc. 83), Plaintiff filed and served its Second
9 Amended Complaint in this action on July 25, 2014 (Doc. 84);

10 WHEREAS, Member Defendants’ response to the Second Amended Complaint is currently
11 due by August 14, 2014;

12 WHEREAS, Member Defendants require an extension of time to prepare and file their
13 response to Plaintiff’s Second Amended Complaint;

14 WHEREAS, Member Defendants have not received any prior extensions to respond to the
15 Second Amended Complaint; and

16 WHEREAS, Plaintiff has agreed to an extension until August 22, 2014;

17 IT IS HEREBY STIPULATED, by and between Plaintiff and Member Defendants, through
18 their undersigned attorneys, that Member Defendants’ time to respond to the Second Amended
19 Complaint is extended up through and including **August 22, 2014**.

20 IT IS SO STIPULATED.

21
22 Dated: August 11, 2014

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

23
24 By: /s/ Ben Patrick (as authorized on 8/11/2014)

25 Ben Patrick
26 Attorneys for Plaintiff
MP MEXLEVEL OF CALIFORNIA, INC.

1 Dated: August 11, 2014

NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP

2
3 By: /s/ Craig C. Crockett

4 Dean A. Morehous

Craig C. Crockett

Attorneys for Defendants

5 CALAVERAS COMMUNICATIONS COMPANY,

6 SEBASTIAN ENTERPRISES, INC., VOLCANO

COMMUNICATIONS COMPANY, STAGELINE

7 COMMUNICATIONS, INC., THE PONDEROSA

TELEPHONE COMPANY, SIERRA TEL

8 COMMUNICATIONS GROUP, VARNET, INC., CAL-

9 ORE TELEPHONE CO., DUCOR TELEPHONE

COMPANY and CONSOLIDATED

10 COMMUNICATIONS HOLDINGS, INC.

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[PROPOSED] ORDER

Pursuant to the parties' stipulation, IT IS HEREBY ORDERED that defendants CALAVERAS COMMUNICATIONS COMPANY, SEBASTIAN ENTERPRISES INC., VOLCANO COMMUNICATIONS COMPANY, STAGELINE COMMUNICATIONS, INC., THE PONDEROSA TELEPHONE COMPANY, SIERRA TEL COMMUNICATIONS GROUP, VARNET, INC., CAL-ORE TELEPHONE CO., DUCOR TELEPHONE COMPANY and CONSOLIDATED COMMUNICATIONS HOLDINGS, INC., shall have an extension of time to respond to Plaintiff's Second Amended Complaint up through and including August 22, 2014.

IT IS SO ORDERED.

Dated: August 12, 2014

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE