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4	(559) 228-6727 Fax M:\35346\Pleadings\efiled docs\second stip-ext-time(execution copy).wpd:jd		
5	Attorneys for Defendants BULLFROGS, INC. d/b/a BULLFROGS BAR		
6	& GRILL; DAVID I. ROSENBAUM and ALISON SUZANNE ROSENBAUM, each individually,		
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8			
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	FRESNO DIVISION		
12			
13	BROADCAST MUSIC, INC.; MOKOJUMBI	Case No. 1:14-CV-00780SMS	
14	MUSIC; UNIVERSAL MUSIC-Z TUNES LLC d/b/a UNIVERSAL MUSIC Z SONGS;		
15	UNIVERSAL MUSIC MGB NA LLC d/b/a UNIVERSAL MUSIC CAREERS;		
16	CONCORD MUSIC GROUP, INC. d/b/a/ JONDORA MUSIC; INTERIOR MUSIC	STIPULATION AND ORDER RE: EXTENSION OF TIME TO RESPOND TO	
17	CORP.; COMBINE MUSIC CORP.; SONY/ATV SONGS LLC; and BEANLY	INITIAL COMPLAINT	
18	SONGS,	[L.R. 144(a)]	
19	Plaintiffs,		
20	V.	Current Response Date: 7/17/14	
21	BULLFROGS, INC. d/b/a BULLFROGS BAR	New Response Date: 8/18/14	
22	& GRILL; DAVID I. ROSENBAUM and ALISON SUZANNE ROSENBAUM,		
23	each individually,		
24	Defendants.		
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27			
28	Stipulation to Extension of Time to Answer Complaint - and Order	l-	

Plaintiffs and Defendants, by and through their counsel and pursuant to Federal Rule of
 Civil Procedure 6(b)(1)(A) and Local Rule 144(a), hereby stipulate to an additional 30-day
 extension of time to respond to Plaintiffs' Complaint in this matter. Plaintiffs filed this action on
 May 21, 2014 and Plaintiffs and Defendants agreed to an initial extension to July 17, 2014.

5 Pursuant to Eastern District Local Rule 144(a), the parties hereby stipulate and agree to 6 extend the date by 30 days from the original extension, but because that date lands on a Saturday, 7 the date for filing would be August 18, 2014. This extension is necessary because the parties are 8 currently and have been attempting to resolve their disputes, and the extension may permit the 9 parties to resolve the matter without incurring the expense of filing unnecessary pleadings. There 10 appears to be no prejudice extending the time for Defendants to respond to the Complaint. 11 Although the parties previously stipulated to an initial extension of time, this is the parties' first 12 request for an extension of time to respond to the initial Complaint.

WHEREFORE, for the foregoing reasons, the parties request and stipulate to this
extension for Defendants to file an answer or otherwise respond to the Complaint on or before
August 18, 2014.

16 IT IS SO STIPULATED.

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Dated: July 15, 2014

COBLENTZ PATCH DUFFY & BASS LLP

19		
20	By _	/s/ Jeremiah J. Burke Jeremiah J. Burke
21		Attorneys for Plaintiffs BROADCAST MUSIC, INC.; MOKOJUMBI
22		MUSIC; UNIVERSAL MUSIC-Z TUNES LLC d/b/a UNIVERSAL MUSIC Z SONGS;
23		UNIVERSAL MUSIC MGB NA LLC d/b/a UNIVERSAL MUSIC CAREERS; CONCORD
24		MUSIC GROUP, INC. d/b/a/ JONDORA MUSIC; INTERIOR MUSIC CORP.; COMBINE MUSIC
25		CORP.; SONY/ATV SONGS LLC; and BEANLY SONGS
26		
27		
28	Stipulation to Extension of Time to Answer Complaint	-2-

1	Dated: July 15, 2014	LANG, RICHERT & PATCH, P.C.
2		
3		By <u>/s/ Scott J. Ivy</u> Scott J. Ivy
4		Attorneys for Defendants BULLFROGS, INC. d/b/a BULLFROGS BAR & GRILL; DAVID I.
5		ROSENBAUM and ALISON SUZANNE ROSENBAUM
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7		
8	IT IS SO ORDERED.	
9	DATED: <u>7/17/2014</u>	/s/ SANDRA M. SNYDER
10		/s/ SANDRA M. SNYDER UNITED STATES MAGISTRATE JUDGE
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27 28	Stipulation to Extension of Time to Answer	r Complaint -3-