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8 A California Limited Partnership

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 RONALD MOORE, ) Case No. 1:14-CV-01117-AWI-BAM  
12 )  
13 Plaintiff, ) STIPULATION AND ORDER FOR  
14 vs. ) SECOND EXTENSION TO RESPOND TO  
15 ) FIRST AMENDED COMPLAINT  
16 )  
17 AMI, LTD., A CALIFORNIA LIMITED )  
PARTNERSHIP; )  
Defendant. )  
)  
)  
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)  
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18 WHEREAS, on October 7, 2014, Plaintiff, Ronald Moore (“Moore”), and Defendant,  
19 AMI, Ltd., a California Limited Partnership (“AMI,” and together with Moore, “the Parties”),  
20 entered into a stipulation extending AMI’s time to respond to Plaintiff’s First Amended  
21 Complaint to October 22, 2014 (Dkt. 15);

22 WHEREAS, on October 22, 2014, Plaintiff, Ronald Moore (“Moore”), through his  
23 attorney of record, Tanya E. Moore, advised AMI through attorney Timothy L. Thompson, who  
24 is also representing AMI although has not yet officially appeared in this action, that Moore  
25 would not take a default against AMI before October 31, 2014, unless the case had not yet  
26 settled and a response had not been filed;

1 WHEREAS, the Parties are currently exploring settlement, a settlement agreement  
2 having been tentatively accepted by AMI and discussions regarding the monetary element of  
3 Moore's claim currently being undertaken; and

4 WHEREAS, the Parties wish to fully explore and exhaust settlement efforts prior to  
5 incurring the expense of AMI preparing and filing its responsive pleading;

6 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
7 the Parties hereto, through their respective counsel, pursuant to Rule 6 of the Federal Rules of  
8 Civil Procedure, and Local Rule 144, that Defendant, AMI, LTD., A CALIFORNIA  
9 PARTNERSHIP, shall have an extension of time up to and including NOVEMBER 21, 2014, to  
10 file a responsive pleading to Plaintiff's First Amended Complaint on file herein. This extension  
11 does not alter any date or event set by Court order, including the Scheduling Conference set for  
12 December 4, 2014.

13 Dated: November 7, 2014

LAW OFFICES OF NICK ZINKIN

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15 By: /s/ Nick Zinkin  
16 Nick Zinkin, Attorney for Defendant, AMI LTD.  
17 A California Limited Partnership

18 Dated: November 7, 2014

MOORE LAW FIRM, P.C.

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20 By: /s/ Tanya E. Moore  
21 Tanya E. Moore, Attorney for Plaintiff, Ronald Moore

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**ORDER**

The Parties having so stipulated and good cause appearing, IT IS HEREBY ORDERED that Defendant AMI, LTD., a California Limited Partnership, shall file a response to Plaintiff's First Amended Complaint on or before November 21, 2014.

IT IS SO ORDERED.

Dated: November 10, 2014

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE