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5 Attorneys for Plaintiff  
Lawrence Green

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

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11 LAWRENCE GREEN,  
12 Plaintiff,

13 vs.

14 ASHLAN PARK CENTER, LLC, a Delaware  
limited liability company; KOROOSH ZAGHI  
15 dba ARBY'S #5524,  
16 Defendants.  
17

) No. 1:14-CV-01824---MJS

) **STIPULATION TO EXTEND TIME FOR**  
) **KOROOSH ZAGHI TO RESPOND TO**  
) **THE COMPLAINT BY MORE THAN 28**  
) **DAYS; ORDER**

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19 WHEREAS, Plaintiff, Lawrence Green ("Green") alleges that a responsive pleading of  
20 Defendant, Koroosh Zaghi ("Zaghi"), is due January 8, 2015;

21 WHEREAS, Green and Zaghi are exploring settlement which would resolve all of  
22 Green's claims against all Defendants, which settlement negotiations include obtaining a report  
23 of a California Certified Access Specialist, reviewing the consultant's findings, and discussing  
24 barrier removal and settlement as appropriate, all of which, given the holidays, is anticipated to  
25 take at least 45 days;

26 WHEREAS, Green and Zaghi therefore wish to extend the time Zaghi's responsive  
27 pleading would be due to February 9, 2015, over twenty-eight days from the initial date that  
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STIPULATION TO EXTEND TIME FOR KOROOSH ZAGHI TO RESPOND TO THE COMPLAINT;  
[PROPOSED] ORDER

1 plaintiff alleges that his responsive pleading was due, thereby requiring approval of the Court  
2 under Local Rule 144;

3 WHEREAS, continuing the deadline for Zaghi's responsive pleading to be filed to  
4 February 9, 2015 will not interfere with any dates or events already set by the Court, including  
5 the scheduling conference which is set for February 26, 2015.

6 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Green and Zaghi,  
7 by and through their attorneys, that Zaghi shall have to and including February 9, 2015 within  
8 which to file his responsive pleading in this matter.

9  
10 Dated: December 19, 2014

MOORE LAW FIRM, P.C.

11 /s/ Tanya E. Moore

12 Tanya E. Moore  
13 Attorneys for Plaintiff  
14 Lawrence Green

15 /s/ Anthony E. Goldsmith

16 Anthony E. Goldsmith  
17 Attorney for Defendant,  
18 Koroosh Zaghi

19 **ORDER**

20 The parties having so stipulated and good cause appearing,

21 **IT IS HEREBY ORDERED** that Defendant Koroosh Zaghi may have to and  
22 including February 9, 2015 within which to file a responding pleading in case  
23 No. 1:14-CV-01824---MJS.

24  
25 IT IS SO ORDERED.

26  
27 Dated: December 19, 2014

/s/ Michael J. Seng

28 UNITED STATES MAGISTRATE JUDGE

STIPULATION TO EXTEND TIME FOR KOROOSH ZAGHI TO RESPOND TO THE COMPLAINT;  
[PROPOSED] ORDER

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STIPULATION TO EXTEND TIME FOR KOROOSH ZAGHI TO RESPOND TO THE COMPLAINT;  
[PROPOSED] ORDER