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6 Attorneys for Golden Empire Transit District and Toddash Kim

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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT

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12 LATOYA JOHNSON, an individual,
13 Plaintiff,
14 v.
15 GOLDEN EMPIRE TRANSIT DISTRICT;
TODDASH KIM; DOES 1 through 100,
16 Defendants.

Case No. 1:14-cv-01841-JLT
**STIPULATION TO CONTINUE
DEADLINE FOR FILING MOTIONS TO
AMEND THE PLEADINGS AND
HEARING ON PLAINTIFF'S MOTION
FOR LEAVE TO FILE AMENDED
COMPLAINT, ETC.**
(Doc. 34)

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18 **RECITALS**

19 This Stipulation is entered into with reference to the following facts:

20 A. Per the Scheduling Order, the deadline for the parties to file motions to amend the
21 pleadings in this case has passed. Plaintiff has filed a Motion to Amend the Scheduling Order to
22 allow her to file a Motion for Leave to File an Amended Complaint.

23 B. Defendants oppose plaintiff's Motion to Amend her Complaint, but do not object
24 to the setting of a new deadline to seek leave to amend the pleadings under the Scheduling Order,
25 so long as the new deadline to file motions to amend the pleadings is continued to May 16, 2016
26 or such date thereafter as the Court deems appropriate. Since the deadline to file non-dispositive
27 motions is April 29, 2016, the parties also seek to extend that deadline to May 16, 2016. The
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1 Stipulation to amend the Scheduling Order deadline for the parties to file a motion to amend the
2 pleadings is without prejudice and does not waive any party's right to object to or oppose any
3 such motion or to challenge the amended pleading on any other grounds.

4 C. Counsel for defendants has conflicts on the date noticed by plaintiff for the
5 hearing on her Motion for Leave to File an Amended Complaint and, therefore, the parties have
6 agreed to continue the hearing on the Motion for a period of one week, as well as the deadlines
7 for defendants to file their Opposition to plaintiff's Motion for Leave to File an Amended
8 Complaint and plaintiff to file a Reply.

9 D. In light of the fact that the trial date is not imminent and the parties have agreed
10 upon the requested continuances, the parties believe there would be no prejudice if said deadlines
11 are continued.

12 **STIPULATION**

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
14 the parties hereto, through their respective counsel, as follows:

15 1. The Scheduling Order deadline for the parties to file motions to amend the
16 pleadings and the deadline for the parties to file non-dispositive motions shall be extended to
17 May 16, 2016, or such other date thereafter as the Court deems appropriate.

18 2. The hearing on plaintiff's Motion for Leave to File an Amended Complaint is
19 continued to May 12, 2016, or such other date thereafter as the Court deems appropriate. The
20 deadlines for defendants to file their Opposition to plaintiff's Motion for Leave to File an
21 Amended Complaint and plaintiff to file a Reply shall be based on the continued hearing date.

22 Respectfully Submitted:

23 Dated: April 25, 2016

LEBEAU • THELEN, LLP

24 By: /s/ Thomas P. Fehér

25 Thomas P. Fehér, Esq.
26 Attorneys for Golden Empire Transit
27 District and Toddash Kim

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Dated: April 25, 2016

LAW OFFICE OF RANDY RUMPH

By: /s/ Randy Rumph
Randy Rumph, Esq.
Attorney for Plaintiff Latoya Johnson

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ORDER

The Stipulation of the parties having been filed and good cause appearing therefore IT IS
HEREBY ORDERED that:

1. The Scheduling Order deadline for the parties to file motions to amend the pleadings and the deadline for the parties to file non-dispositive motions shall be extended to May 16, 2016.

2. The hearing on plaintiff's Motion for Leave to File an Amended Complaint is continued to May 12, 2016. The deadlines for defendants to file their Opposition to plaintiff's Motion for Leave to File an Amended Complaint and plaintiff to file a Reply shall be based on the continued hearing date.

IT IS SO ORDERED.

Dated: April 25, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE