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Attorney for Defendant

Suman D. Bhakta and Nutan
S. Bhakta, both individually and dba
Caprice Motel

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

* * * *

CECIL SHAW,) CASE NO. 1: 14-cv-01965---JLT
Plaintiff,)
vs.)
SUMAN D. BHAKTA, individually and dba) SECOND STIPULATION AND
CAPRICE MOTEL; NUTAN S. BHAKTA,) PROPOSED ORDER FOR EXTENSION
individually and dba CAPRICE MOTEL;) OF TIME FOR SUMAN D. BHAKTA,
Defendants.) individually and dba CAPRICE MOTEL;
) and NUTAN S. BHAKTA, individually
) and dba CAPRICE MOTEL TO
) RESPOND TO COMPLAINT
)
) (Doc 8)
)

WHEREAS:

1. Plaintiff CECIL SHAW filed this action on December 10, 2014.
2. This is the second request for an extension of time for SUMAN D. BHAKTA, individually and dba CAPRICE MOTEL; and NUTAN S. BHAKTA, individually and dba CAPRICE MOTEL (“Defendants”). A previous extension of time was granted by the plaintiff within the statutory allowance; thus, court approval is required for a further extension of time.
3. Plaintiff and Defendants are in settlement negotiations at this time.
4. Defendants have obtained a CASp inspection, and are waiting for the report to be written so that a proposed plan of remediation and settlement can be agreed upon.
5. The parties agree that settlement of this case would save valuable court time and resources.
6. The parties have agreed to extend Defendants’ time to respond to the complaint until March 11, 2015, subject to the court’s approval, and believe that the case can be settled within that

1 time.

2 7. This extension of time will not alter any date or event already set by Court order, including
3 the mandatory scheduling conference.

4 NOW THEREFORE, Defendants through their attorneys, and Plaintiff Cecil Shaw, through
5 his attorneys, hereby stipulate and agree that the time for Defendants SUMAN D. BHAKTA,
6 individually and dba CAPRICE MOTEL; and NUTAN S. BHAKTA, individually and dba
7 CAPRICE MOTEL to answer or otherwise respond to the Complaint shall be extended up to and
8 including March 11, 2015, pending court approval.

9
10 IT IS SO STIPULATED.

11 Dated: February 25, 2015

MOORE LAW FIRM, PC

12 _____/s/Tanya Moore
Tanya Moore, Attorney for Plaintiff Cecil Shaw

13
14 Dated: February 25, 2015

15 _____/s/Bruce A. Neilson
Bruce A. Neilson, Attorney for Defendants
16 Suman D. Bhakta and Nutan S. Bhakta, both
individually and dba Caprice Motel

17
18 IT IS SO ORDERED.

19 Dated: February 27, 2015

_____/s/ Jennifer L. Thurston

20 UNITED STATES MAGISTRATE JUDGE