

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

RONALD MOORE,

Plaintiff,

V.

ROSS DRESS FOR LESS, INC., dba
ROSS DRESS FOR LESS #163; CLOVIS
SHAW PARTNERS, LLC, operating in
California as CLOVIS SHAW 26, LLC.

Defendants.

Case No. 1:15-CV-00021-AWI-SKO

**STIPULATION AND ORDER TO EXTEND
THE TIME FOR DEFENDANTS TO
RESPOND TO THE COMPLAINT AND TO
CONTINUE THE SCHEDULING
CONFERENCE**

Complaint Served: January 7, 2015

1 Plaintiff Ronald Moore (“Plaintiff”), Defendant Clovis Shaw Partners, LLC, and Defendant
2 Ross Dress for Less, Inc., by and through undersigned counsel, hereby stipulate to an extension of
3 time so that Defendants shall have until April 24, 2015, to respond to the Complaint. Additionally,
4 the parties respectfully request that the Court continue the Scheduling Conference, currently set for
5 April 7, 2015, to a date convenient for the Court on or after May 8, 2015.

6 Good cause exists for these extensions because a Certified Access Specialist inspected the
7 property in question on March 13, 2015, and the parties are in the process of reviewing the CASp
8 Inspection Report, evaluating the alleged access barriers set forth in Plaintiff’s Complaint, and
9 discussing the possibility of an informal, global resolution of this dispute without the time and
10 expense of further litigation. In particular, permitting these extensions of time will allow Defendants
11 avoid the cost of preparing a formal response to the Complaint if the parties are able to resolve this
12 dispute prior to April 24, 2015, and will also permit the parties to avoid the time and expense of
13 preparing a joint status report and attending a Scheduling Conference if the parties are able to reach
14 a global resolution prior to April 24, 2015.

15 **IT IS SO STIPULATED.**

16
17 Dated: March 24, 2015

/s/ Tanya E. Moore [with permission]
TANYA E. MOORE
MOORE LAW FIRM, P.C.
Attorneys for Plaintiff
RONALD MOORE

20
21
22 Dated: March 24, 2015

/s/ Brady K. McGuinness [with permission]
BRADY K. MCGUINNESS
BETTS, RUBIN & MCGUINNESS
Attorneys for Defendant
CLOVIS SHAW PARTNERS, LLC

1
2 Dated: March 24, 2015

3 */s/ Michael G. Leggieri*
4 MICHAEL G. LEGGIERI
5 LITTLER MENDELSON, P.C.
6 Attorneys for Defendant
7 ROSS DRESS FOR LESS, INC.

8 **ORDER**

9 Good cause appearing, **IT IS HEREBY ORDERED:**

10 1. Defendants shall have until April 24, 2015, to respond to the Complaint;

11 2. The April 7, 2015 Scheduling Conference is continued until May 21, 2015, at 10:15
a.m., in Courtroom 7; and

12 3. The parties shall file their Joint Scheduling Report no later than seven days prior to
the date set for the Scheduling Conference.

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14 IT IS SO ORDERED.

15 Dated: March 25, 2015

16 */s/ Sheila K. Oberto*
17 UNITED STATES MAGISTRATE JUDGE