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8 Attorneys for Defendants NAGI MOHSEN ZAMZAMI, individually and dba CITY WIDE
9 MARKET; KHADIGA M. ZAMZAMI; MOHAMED M. MUTHANA, individually and dba
10 CITY WIDE MARKET; and AMRIA M. ALZAMZAMI

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 RONALD MOORE,

14 Plaintiffs,

15 vs.

16 NAGI MOHSEN ZAMZAMI, individually
17 and dba CITY WIDE MARKET;
18 KHADIGA M. ZAMZAMI; MOHAMED
19 M. MUTHANA, individually and dba CITY
20 WIDE MARKET; and AMRIA M.
21 ALZAMZAMI,

22 Defendants.

CASE NO. 1:15-CV-00480----SAB

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS NAGI MOHSEN
ZAMZAMI, individually and dba CITY
WIDE MARKET; KHADIGA M.
ZAMZAMI; MOHAMED M.
MUTHANA, individually and dba CITY
WIDE MARKET; and AMRIA M.
ALZAMZAMITO RESPOND TO THE
COMPLAINT; ORDER**

23 IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, by
24 and through their respective counsel, that Defendants NAGI MOHSEN ZAMZAMI,
25 individually and dba CITY WIDE MARKET; KHADIGA M. ZAMZAMI; MOHAMED M.
26 MUTHANA, individually and dba CITY WIDE MARKET; and AMRIA M. ALZAMZAMI
27 (collectively "Defendants"), shall have an extension of time, to and including June 15, 2015, to
28 respond to Plaintiff RONALD MOORE's Complaint.

1 A previous extension was provided to Defendants. A Court Order is required as the
2 extension now exceeds twenty-eight (28) days. A court Order will not affect any date or event
3 set by the court Order, including the scheduling conference. This extension is sought to afford
4 the parties an opportunity to explore settlement.

5 Good cause exists for this second extension of time as Defendants are gathering the
6 information necessary to explore an informal resolution with Plaintiff, including meeting with
7 contractors who specialize in accessing requirements for compliance with the Americans with
8 Disabilities Act. It is the Parties' hope to fully exhaust informal settlement efforts before
9 expending attorneys' fees and Court resources responding to the complaint.
10

11 This Stipulation may be executed in counterpart and by facsimile signature, each
12 of which when executed shall be an original and all of which together shall constitute one in the
13 same Stipulation.
14

15 Dated: May 15, 2015

QUINLAN, KERSHAW & FANUCCHI, LLP.

17 By: /s/ Edward L. Fanucchi
18 Edward L. Fanucchi, Esq.
19 Attorneys for Defendants
20 NAGI MOHSEN ZAMZAMI, individually
21 and dba CITY WIDE MARKET;
22 KHADIGA M. ZAMZAMI; MOHAMED
M. MUTHANA individually and dba CITY
WIDE MARKET; and AMRIA M.
ALZAMZAMI

23 Dated: May 15, 2015

MOORE LAW FIRM, P.C.

25 By: /s/ Tanya E. Moore
26 Tanya E. Moore, Esq.
27 Attorneys for Plaintiff
28 RONNIE MOORE

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ORDER

Pursuant to stipulation between the parties and good cause appearing,

IT IS HEREBY ORDERED that Defendants, NAGI MOHSEN ZAMZAMI, individually and dba CITY WIDE MARKET; KHADIGA M. ZAMZAMI; MOHAMED M. MUTHANA, individually and dba CITY WIDE MARKET; and AMRIA M. ALZAMZAMI , shall have an extension of time to and including June 15, 2015 to respond to Plaintiff RONALD MOORE's Complaint.

IT IS SO ORDERED.

Dated: May 18, 2015



UNITED STATES MAGISTRATE JUDGE