

**Bruce A. Neilson #096952
7108 N. Fresno St. #410
Fresno, California 93720
Telephone (559) 432-9831
Facsimile (559) 432-1837**

**Attorney for Defendant
RL & KM, INC.**

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

* * * *

JOSE ESCOBEDO,) CASE NO. 1:15-cv-00499 -MCE-GSA
Plaintiff,)
vs.) STIPULATION AND ORDER FOR
MAJID ALI dba DUB CUSTOM TIRE;) EXTENSION OF TIME TO RESPOND
RL & KM, INC.; DUB CUSTOM TIRE &) AND TO CONTINUE DUE DATE FOR
WHEEL dba DUB CUSTOM TIRE,) JOINT STATUS REPORT
Defendants.)

WHEREAS:

1. Plaintiff Jose Escobedo filed this action on March 31, 2015, and filed an Amended Complaint on May 12, 2015.

2. Plaintiff and Defendant RL & KM, INC. are in settlement negotiations at this time, however, the CASp inspection and report needed to finalize a settlement is not yet completed. Further the complaint was amended to add the current tenant of the subject property and the old tenant has been dismissed. As a result, no defendants have filed responses to the amended complaint with Defendant RL & KM, INC.'s response due May 29, 2015 and the tenant, Dub Custom Tire & Wheel's response due June 9, 2015 (which is after the current due date (June 5, 2015) of the joint status report). No prior extensions for any response to the amended complaint have been given.

3. Accordingly, the parties agree that settlement of this case would save valuable court time and resources and make preparation of the joint status report conference unnecessary. Further,

1 preparation of the joint status report will add to the costs of the case and make it more difficult to
2 reach a settlement.

3 4. In order to facilitate settlement, and to allow for the joining of the recently added
4 defendant, the parties propose that the time for filing of defendant RL & KM, INC.'s response be
5 extended to June 30, 2015 and that the joint status report due date be continued to July 15, 2015.

6 NOW THEREFORE, Defendant RL & KM, INC. through its attorney, and Plaintiff Jose
7 Escobedo, through his attorneys, hereby stipulate and agree that the new deadline for Defendant
8 RL & KM, INC. to file an answer or otherwise respond to the complaint is June 30, 2015, and that
9 the due date for the joint status report in this matter shall be continued to July 15, 2015, pending
10 court approval.

11 **IT IS SO STIPULATED.**

12 Dated: June 1, 2015

MOORE LAW FIRM, PC

/s/Tanya Moore

13 Tanya Moore, Attorney for Plaintiff JOSE ESCOBEDO

14 Dated: June 1, 2015

/s/Bruce A. Neilson

15 Bruce A. Neilson, Attorney for Defendant RL & KM, INC.

17 **ORDER**

18 The Parties having so stipulated and good cause appearing,

19 IT IS HEREBY ORDERED that the Defendant RL & KM, INC. shall have until on or before June
20 30, 2015 to file an answer or otherwise respond in this action, and that the due date for the filing of
21 the joint status report in this action be continued to July 15, 2015.

22 **IT IS SO ORDERED.**

23 Dated: June 2, 2015

24 
25 MORRISON C. ENGLAND, JR., CHIEF JUDGE
26 UNITED STATES DISTRICT COURT