

1 **BOUTIN JONES INC.**
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8 Attorneys for Defendants
9 Mohave County Absentee Landowners News, LLC;
10 California City Absentee Landowners News, LLC;
11 Mohave County Absentee Landowner News, LLC;
12 Patrick A. Donnelly's Vacant Property Owners News, LLC;
13 and Patrick A. Donnelly

14 UNITED STATES DISTRICT COURT

15 EASTERN DISTRICT OF CALIFORNIA - FRESNO

16 MOHAVE COUNTY LANDOWNER)
17 NEWS, INC., an Arizona corporation, dba) CASE NO.: 1:15-cv-00877---JLT
18 CALIFORNIA CITY LANDOWNERS)
19 ASSOCIATION and dba MOHAVE) **STIPULATION TO EXTEND THE**
20 COUNTY LANDOWNERS) **TIME TO RESPOND TO AMENDED**
21 ASSOCIATION,) **COMPLAINT; [PROPOSED] ORDER**

22 Plaintiff,) (Doc. 14)

23 v.)

24 MOHAVE COUNTY ABSENTEE)
25 LANDOWNERS NEWS, LLC, an Arizona)
26 limited liability company; CALIFORNIA)
27 CITY ABSENTEE LANDOWNERS)
28 NEWS, LLC, a California limited liability)
29 company; MOHAVE COUNTY)
30 ABSENTEE LANDOWNER NEWS LLC,)
31 a Florida limited liability company; RENO)
32 INVESTMENTS, INC., a Florida)
33 corporation; LANDOWNERS)
34 ASSOCIATION, LLC, a Florida limited)
35 liability company; PATRICK A.)
36 DONNELLY'S VACANT PROPERTY)
37 OWNERS NEWS, LLC; a Florida limited)
38 liability company; PATRICK A.)
39 DONNELLY, an individual; JAMES D.)
40 OWNBY, an individual; DOES 1 through)
41 50,)

42 Defendants.)

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1 Plaintiff Mohave County Landowner News, Inc., an Arizona corporation, dba California City
2 Landowners Association and dba Mohave County Landowners Association (hereinafter "Plaintiff")
3 and Defendants Mohave County Absentee Landowners News, LLC; California City Absentee
4 Landowners News, LLC; Mohave County Absentee Landowner News, LLC; Patrick A. Donnelly's
5 Vacant Property Owners News, LLC; and Patrick A. Donnelly (hereinafter "Stipulating
6 Defendants"), by and through their respective, undersigned counsel of record, stipulate and agree
7 as follows:

8 1. On June 19, 2015, Plaintiff served the Summons and the Amended Complaint in
9 this action on Stipulating Defendants.

10 2. Based on that date of service, absent stipulation, Stipulating Defendants have until
11 July 10, 2015 to serve and file their response to the Amended Complaint.

12 3. Due to time which was required for Stipulating Defendants' to retain California
13 counsel and the complexity of this action, Stipulating Defendants require additional time to
14 respond to the Amended Complaint.

15 4. Plaintiff and Stipulating Defendants agree that the time by which Stipulating
16 Defendants shall answer or otherwise respond to the Amended Complaint should be extended by
17 fourteen (14) days, to and including July 24, 2015.

18 **IT IS SO STIPULATED.**

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20 Dated: July 7, 2015

BOUTIN JONES INC.

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By: /s/ Kelley M. Lincoln

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Kelley M. Lincoln
Gabrielle D. Boutin

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Attorneys for Defendants

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Mohave County Absentee Landowners News, LLC;
California City Absentee Landowners News, LLC;
Mohave County Absentee Landowner News, LLC;
Patrick A. Donnelly's Vacant Property Owners News,
27 LLC; and Patrick A. Donnelly

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**STIPULATION TO EXTEND THE TIME TO RESPOND TO AMENDED COMPLAINT; [PROPOSED]
ORDER**

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Dated: July 7, 2015

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/ Devon R. McTeer
(as approved on July 7, 2015)

Marshall C. Whitney
Timothy J. Buchanan
Devon R. McTeer

Attorneys for Plaintiff

Mohave County Landowner News, Inc., an Arizona
corporation, dba California City Landowners
Association and dba Mohave County Landowners
Association

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: July 8, 2015

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE