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**Attorney for Defendants**  
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Business Solutions

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

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RACHEL LOBATO, ) CASE NO. 1:15-cv-01127--BAM  
)  
Plaintiff, ) THIRD STIPULATION AND  
) PROPOSED ORDER FOR EXTENSION  
vs. ) OF TIME FOR PAUL RIAR aka  
) SURINDER PAUL SINGH RIAR,  
) individually and dba ROEDING PARK  
PAUL RIAR aka SURINDER PAUL ) SHELL; MAHJA BUSINESS  
) SOLUTIONS, a California corporation,  
SINGH RIAR, individually and dba ) dba ROEDING PARK SHELL; and  
ROEDING PARK SHELL; MAHJA ) SIMERJIT RIAR TO RESPOND TO  
BUSINESS SOLUTIONS, a California ) COMPLAINT  
corporation, dba ROEDING PARK )  
SHELL; SIMERJIT RIAR; )  
Defendants.

WHEREAS:

1. Plaintiff RACHEL LOBATO filed her complaint in this action on July 20, 2015.
2. This is the third request for an extension of time for PAUL RIAR aka SURINDER PAUL SINGH RIAR, individually and dba ROEDING PARK SHELL; MAHJA BUSINESS SOLUTIONS, a California corporation, dba ROEDING PARK SHELL; and SIMERJIT RIAR (“Defendants”). A previous extension of time was granted by the Court on September 30, 2015 and court approval is required for a further extension of time.
3. Plaintiff and Defendants continue to be in settlement negotiations at this time.
4. Defendants have had a CASp inspection performed and report prepared, however a supplemental report that will affect a proposed settlement has been delayed beyond that previously

anticipated by the defendants.

1 5. The parties agree that settlement of this case would save valuable court time and resources.

2 6. The parties have agreed to extend Defendants' time to respond to the complaint until  
3 November 20, 2015, subject to the court's approval, and believe that the case can be settled within  
4 that time.

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

7 NOW THEREFORE, Defendants through their attorneys, and Plaintiff JOSE ESCOBEDO  
8 through his attorneys, hereby stipulate and agree that the time for PAUL RIAR aka SURINDER  
9 PAUL SINGH RIAR, individually and dba ROEDING PARK SHELL; MAHJA BUSINESS  
10 SOLUTIONS, a California corporation, dba ROEDING PARK SHELL; and SIMERJIT RIAR to  
11 answer or otherwise respond to the Complaint shall be extended up to and including November 20,  
12 2015, pending court approval.

13 IT IS SO STIPULATED.

14 Dated: October 23, 2015 MOORE LAW FIRM, PC  
15 /s/Tanya Moore  
Tanya Moore, Attorney for Plaintiff Rachel Lobato

16 Dated: October 23, 2015 /s/Bruce A. Neilson  
17 Bruce A. Neilson, Attorney for Defendants  
18 Paul Riar, Simerjit Riar and Mahja Business  
Solutions

19 ORDER

20 **IT IS SO ORDERED that** defendants PAUL RIAR aka SURINDER PAUL SINGH  
21 RIAR, individually and dba ROEDING PARK SHELL; MAHJA BUSINESS SOLUTIONS, a  
22 California corporation, dba ROEDING PARK SHELL; and SIMERJIT RIAR shall have until  
23 **November 30, 2015** to answer or otherwise respond to the Complaint. IT IS FURTHER  
24 ORDERED that the Scheduling Conference is continued from November 30, 2015 to **December**  
25 **16, 2015 at 8:30 AM** in Courtroom 8 before Judge McAuliffe.

26  
27 Dated: October 27, 2015

/s/ Barbara A. McAuliffe  
28 UNITED STATES MAGISTRATE JUDGE