



1 Plaintiff Arthur Owens (“Plaintiff”) and Defendant Fresno Foods, LLC, dba Jack in the  
2 Box #526 (“Defendant,” and together with Plaintiff, “the Parties”), by and through their  
3 respective counsel, hereby stipulate as follows:

4 1. Defendant was granted an extension of time to November 16, 2015 within which  
5 to respond to Plaintiff’s complaint;

6 2. Defendant requests an additional extension of time within which to respond to  
7 Plaintiff’s complaint to allow the Parties to explore settlement;

8 3. The Parties agree that Defendant may have to and including January 29, 2016  
9 within which to respond to the complaint, which extension exceeds the 28 days which may be  
10 given without leave of Court under Local Rule 144;

11 4. Plaintiff has been diligently trying to serve Defendant Pauline F. Kouvalas-Prew,  
12 Trustee of the Pauline F. Kouvalas-Prew Revocable Living Trust dated August 15, 2011  
13 (“Prew”) but has been as yet unable to effect service. Defendant agrees to cooperate with  
14 Plaintiff to try to obtain information that will permit service on Prew;

15 5. A Status and Scheduling Conference is currently set in this matter for January 12,  
16 2016. The Parties wish to continue the conference both to allow service on, and the appearance  
17 of, Prew, as well as allow the Parties to fully explore settlement. Therefore, the Parties request  
18 that the Status and Scheduling Conference be continued to a date after February 26, 2016 at the  
19 Court’s convenience.

20 **IT IS SO STIPULATED.**

21 Date: December 21, 2015

MOORE LAW FIRM, P.C.

22 /s/ Tanya E. Moore

23 Tanya E. Moore

24 Attorney for Plaintiff, Arthur Owens

25 BHATIA & ASSOCIATES

26 /s/ Peter Cook

27 Peter Cook

28 Attorney for Defendant, Fresno Foods,  
LLC, dba Jack in the Box #526

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**ORDER**

The Parties having so stipulated and good cause appearing,

**IT IS HEREBY ORDERED** that Defendant, Fresno Foods, LLC, dba Jack in the Box #526, shall have to and including January 29, 2016 within which to respond to Plaintiff's complaint.

**IT IS FURTHER ORDERED** that the Status and Scheduling Conferences currently set for January 12, 2016 be continued to March 8, 2016 at 3:00 p.m. in Courtroom 9, before Magistrate Judge Stanley A. Boone. The parties are to file their Joint Scheduling Report no later than seven days prior to the conference.

IT IS SO ORDERED.

Dated: December 21, 2015



UNITED STATES MAGISTRATE JUDGE