

1 Tanya E. Moore, SBN 206683
 MOORE LAW FIRM, P.C.
 2 332 North Second Street
 San Jose, California 95112
 3 Telephone (408) 298-2000
 Facsimile (408) 298-6046
 4 Email: tanya@moorelawfirm.com

5 Attorney for Plaintiff
 Arthur Owens

7 SEYFARTH SHAW LLP
 Kristina M. Launey (SBN 221335)
 8 400 Capitol Mall, Suite 2350
 Sacramento, California 95814-4428
 9 Telephone: (916) 448-0159
 Facsimile: (916) 558-4839
 10 E-mail: klauney@seyfarth.com

11
 12 Attorneys for Defendants (*Specially Appearing*)
 Interstate Management Company LLC
 13 Dba Residence Inn by Marriott, et al.
 BRE Newton Hotels Property Owner LLC

14
 15
 16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**

18 ARTHUR OWENS,

19 Plaintiff,

20 vs.

21 INTERSTATE MANAGEMENT COMPANY)
 22 LLC dba RESIDENCE INN BY MARRIOTT,)
 et al.,)

23 Defendants.)
 24)

No. 1:16-cv-00305-LJO-BAM

)
) **SECOND STIPULATION FOR**
) **EXTENSION OF TIME FOR ALL**
) **DEFENDANTS TO RESPOND TO**
) **COMPLAINT AND TO CONTINUE**
) **SCHEDULING CONFERENCE ;**
) **[PROPOSED] ORDER**

25
 26
 27
 28
 STIPULATION FOR SECOND EXTENSION OF TIME AND TO CONTINUE SCHEDULING
 CONFERENCE; [PROPOSED] ORDER

1 **IT IS HEREBY STIPULATED** by and between Plaintiff Arthur Owens, by and
2 through his counsel of record, and Defendants Interstate Management Company LLC dba
3 Residence Inn by Marriott and BRE Newton Hotels Property Owner LLC (collectively
4 “Defendants”), by and through their attorney who is specially appearing on their behalves, that
5 pursuant to Federal Rule of Civil Procedure 6(a) and Local Rule 144(a), Defendants may have
6 to and including June 17, 2016 to file a responsive pleading in this matter. This extension of
7 time is Defendants’ second extension and is requested because Defendants are currently
8 engaging counsel to represent them in this matter, and to allow the parties time to discuss
9 resolution of this matter prior to engaging in litigation.

10 **THE PARTIES FURTHER STIPULATE AND REQUEST** that the Court therefore
11 also continue the Scheduling Conference currently scheduled for June 1, 2016, to a date at the
12 Court’s convenience on or after June 30, 2016.

13
14 Date: May 16, 2016

MOORE LAW FIRM, P.C.

15
16 /s/ Tanya E. Moore

Tanya E. Moore
Attorney for Plaintiff
Arthur Owens

17
18
19
20 Date: May 16, 2016

INTERSTATE MANAGEMENT
COMPANY LLC DBA RESIDENCE INN
BY MARRIOTT and BRE NEWTON
HOTELS PROPERTY OWNER LLC

21
22
23 /s/ Kristina M. Launey

By: Kristina M. Launey
Seyfarth Shaw LLP
Specially appearing for Defendants

24
25
26
27
28

STIPULATION FOR SECOND EXTENSION OF TIME AND TO CONTINUE SCHEDULING
CONFERENCE; [PROPOSED] ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that Defendants, Interstate Management Company LLC dba Residence Inn by Marriott and BRE Newton Hotels Property Owner LLC, shall have to and including June 17, 2016 within which to file a responsive pleading.

IT IS FURTHER ORDERED that the Scheduling Conference currently scheduled for June 1, 2016, is continued to **July 28, 2016 at 9:00 AM, 2016** before Judge McAuliffe.

IT IS SO ORDERED.

IT IS SO ORDERED.

Dated: May 17, 2016

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE