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6 Attorneys Defendant  
BRAD BERKLEY

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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10 FRESNO DIVISION  
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12 GLENN A. ABRAHAMSON, an individual;  
JOSEPH WONG, an individual; BB17, LLC,  
13 a Wyoming limited liability company,

14 Plaintiffs,

15 vs.

16 BRAD BERKLEY, an individual,

17 Defendant.

Case No.: 1:16-CV-00348-AWI-BAM

**STIPULATION EXTENDING TIME TO  
FILE AN ANSWER TO FIRST  
AMENDED COMPLAINT BY NOT  
MORE THAN 28 DAYS; [~~PROPOSED~~]  
ORDER**

First Amended Complaint Filed: 3/18/16

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20 Plaintiffs Glenn A. Abrahamson ("Plaintiff") and Defendant Bradley Berkley ("Defendant"),  
21 by and through their attorneys of record in this case, hereby stipulate and agree that:

22 WHEREAS, Plaintiffs filed their initial Complaint in this action on March 11, 2016 (ECF  
23 No. 1);

24 WHEREAS, Plaintiffs filed their First Amended Complaint on March 18, 2016 (ECF No. 2);

25 WHEREAS, Defendant's deadline to file a responsive pleading was extended by 14 days to  
26 May 6, 2016;

27 WHEREAS, Defendant filed its Motion to Dismiss for Lack of Personal Jurisdiction and an  
28 anti-SLAPP Motion to Strike on May 6, 2016;

1 WHEREAS, the Court issued and entered its ruling on the Motion to Dismiss and Motion to  
2 Strike on September 2, 2016;

3 WHEREAS, the current deadline to file an Answer to the First Amended Complaint is  
4 September 16, 2016;

5 WHEREAS, the parties' respective attorneys met and conferred pursuant to Rule 26(f) and  
6 agree to allow Defendant a brief 6-day extension of time to file his Answer (the two extensions will  
7 be less than 28 days prescribed in Rule 144(a)); and

8 WHEREAS, the joint discovery plan submittal deadline and the Mandatory Scheduling  
9 Conference date will not be changed.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through  
11 their respective counsel, that Defendant shall file his Answer by September 22, 2016.

12 **IT IS SO STIPULATED.**

13 Dated: Septmeber 15, 2016

FOX ROTHSCHILD LLP

14  
15 By /s/Jaemin Chang  
16 Jeffrey D. Polsky  
17 Jaemin Chang  
Attorneys for Defendant  
BRAD BERKLEY

18 Dated: Septmeber 15, 2016

KAHN, SOARES & CONWAY, LLP

19  
20 By /s/ Richard C. Conway (as authorized on 9/14/16)  
21 Richard C. Conway  
22 Attorneys for Plaintiff  
23 GLENN A. ABRAHAMSON  
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**ORDER**

The Court, having duly considered the parties' stipulation set forth above, and good cause appearing, orders as follows:

Defendant's deadline to file his Answer to Plaintiffs' First Amended Complaint is extended to September 22, 2016.

**IT IS SO ORDERED.**

Dated: September 16, 2016

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