

Amrik Bhandal and Bhandal Petroleum Corporation dba Big B's Travel Center

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

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RACHEL LOBATO,

Plaintiff,

VS.

AMRIK BHANDAL; BHANDAL
PETROLEUM CORPORATION dba BIG
B'S TRAVEL CENTER;

Defendants.

CASE NO. 1:16-cv-00833-AWI-MJS

SECOND STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND TIME
FOR ALL DEFENDANTS TO RESPOND
TO THE COMPLAINT; STIPULATION
TO CONTINUE DATE FOR
MANDATORY SCHEDULING
CONFERENCE TO AFFORD THE
PARTIES AN OPPORTUNITY TO
FULLY EXPLORE SETTLEMENT

WHEREAS:

1. Plaintiff RACHEL LOBATO (“Plaintiff”) filed her complaint in this action on June 16, 2016.

2. This is the second request for an extension of time for AMRIK BHANDAL and BHANDAL PETROLEUM CORPORATION dba BIG B'S TRAVEL CENTER ("Defendants").

A previous extension of time was granted by Plaintiff within the statutory allowance; thus, court approval is required for a further extension of time.

3. Plaintiff and Defendants are in settlement negotiations at this time, and a CASp report has been received this week. Time is needed to review the report and finalize a settlement. The parties are hopeful a settlement can now be reached if an extension of time is granted to respond and the mandatory scheduling conference presently set for September 22, 2016 is continued.

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

5. The parties have agreed that the time for all Defendants to answer or otherwise respond to the Complaint shall be extended up to and including October 13, 2016 pending court approval, and that the mandatory scheduling conference be continued to a date on or after October 27, 2016 at the Court's convenience, also pending court approval.

NOW THEREFORE, Defendants through their attorneys, and Plaintiff RACHEL LOBATO, through her attorney, hereby stipulate and agree that the time for AMRIK BHANDAL and BHANDAL PETROLEUM CORPORATION dba BIG B'S TRAVEL CENTER to answer or otherwise respond to the Complaint shall be extended up to and including October 13, 2016 pending court approval, and that the mandatory scheduling conference be continued to a date on or after October 27, 2016 at the Court's convenience, also pending court approval.

IT IS SO STIPULATED.

Dated: September 7, 2016

MOORE LAW FIRM, PC

/s/Tanya E. Moore

Tanya E. Moore, Attorney for Plaintiff Rachel Lobato

Dated: September 7, 2016

/s/Bruce A. Neilson

Bruce A. Neilson, Attorney for Defendants,
Amrik Bhandal and Bhandal Petroleum Corporation
dba Big B's Travel Center

ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the mandatory scheduling conference in this action be continued from September 22, 2016 to November 9, 2016 at 1:30pm in Courtroom 6 of the above entitled court. A joint scheduling report shall be filed no later than seven days prior to this date.

IT IS ALSO HEREBY ORDERED that the time for all Defendants to answer or otherwise respond to the Complaint shall be extended up to and including October 13, 2016.

IT IS SO ORDERED.

Dated: September 16, 2016

/s/ Michael J. Seng

UNITED STATES MAGISTRATE JUDGE

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