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 10 Jose Acosta

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

13 JOSE ACOSTA,
 14 Plaintiff,
 15 vs.
 16 GREAT AMERICAN INVESTMENTS, INC.,
 17 dba GREAT AMERICAN CAR WASH, et al.,
 18 Defendants.

) No. 1:16-cv-01258-LJO-BAM
)
) **SECOND STIPULATION FOR**
) **EXTENSION OF TIME FOR ALL**
) **DEFENDANTS TO RESPOND TO**
) **COMPLAINT; ~~PROPOSED~~ ORDER**

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1 **WHEREAS**, Plaintiff Jose Acosta (“Plaintiff”), by and through his attorney of record,
2 and Defendants Great American Investments, Inc., dba Great American Car Wash; Zeyad
3 Reyad Elalami; and Mamdouh Reyad Elalami (“Defendants,” and together with Plaintiff, “the
4 Parties”), who are presently seeking counsel and are specially appearing on their own behalf for
5 the sole purpose of obtaining this extension, previously entered into a stipulation granting
6 Defendants to and including October 25, 2016 to file a responsive pleading in this matter (Dkt.
7 6);

8 **WHEREAS**, the Parties are engaged in settlement negotiations and are hopeful that a
9 settlement can be reached informally, and desire to conserve attorney’s fees which would be
10 incurred in filing the responsive pleading while they exhaust settlement efforts;

11 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties
12 that Defendants may have to and including November 16, 2016 to file responsive pleadings in
13 this matter. This extension of time does not alter the date of any event or any deadline already
14 fixed by Court order.

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16 Dated: October 27, 2016

MOORE LAW FIRM, P.C.

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18 /s/ Tanya E. Moore

Tanya E. Moore
Attorneys for Plaintiff
Arthur Owens

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21 Dated: October 27, 2016

/s/ AJ Rassamni

Defendant, Great American Investments,
Inc., dba Great American Car Wash
By: AJ Rassamni

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25 Dated: October 27, 2016

/s/ Zeyad Reyad Elalami

Defendant, Zeyad Reyad Elalami

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/s/ Mamdouh Reyad Elalami

Defendant, Mamdouh Reyad Elalami

1 I attest that the signatures of the persons whose electronic signatures are shown above are
2 maintained by me, and that their concurrence in the filing of this document and attribution of
3 their signatures was obtained.

4 /s/ Tanya E. Moore

5 Tanya E. Moore
6 Attorneys for Plaintiff,
7 Jose Acosta

8 **ORDER**

9 The Parties having so stipulated and good cause appearing,

10 **IT IS HEREBY ORDERED** that Defendants, Great American Investments, Inc., dba
11 Great American Car Wash; Zeyad Reyad Elalami; and Mamdouh Reyad Elalami, shall have to
12 and including November 16, 2016 within which to file responsive pleadings.

13 **IT IS SO ORDERED.**

14 Dated: October 28, 2016

15 /s/ Barbara A. McAuliffe
16 UNITED STATES MAGISTRATE JUDGE

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