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

JOSE TRUJILLO,

Plaintiff,

vs.

FAIROU AMERICAN, INC. dba IVANHOE  
SPEEDY MART, et al.,

Defendants.

No. 1:17-cv-00077-AWI-SKO

**STIPULATION GRANTING PLAINTIFF  
LEAVE TO FILE FIRST AMENDED  
COMPLAINT; ORDER**

**(Doc. 21)**

**IT IS HEREBY STIPULATED** by and between Plaintiff, Jose Trujillo (“Plaintiff”), and Defendants, Fairou American, Inc. dba Ivanhoe Speedy Mart, Rami Khazal, Manila Khazal, and Nadia Aroush (collectively “Defendants,” and together with Plaintiff, the “Parties”), the parties hereto, through their respective attorneys of record, that Plaintiff may file a First Amended Complaint, a copy of which is attached hereto as Exhibit “A.” This amendment will not modify any date or deadline fixed by the Court’s Scheduling Order dated June 8, 2017 (Dkt. 20) pursuant to Fed. R. Civ. P. 16(b)(4), and is not prejudicial to Defendants, the product of undue delay, proposed in bad faith, or futile. By stipulating to this amendment, Defendants do not waive any claims or defenses they may have as to the contents of the First Amended Complaint.

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; ORDER

1           **IT IS FURTHER STIPULATED** that Plaintiff will file his First Amended Complaint  
2 within five (5) calendar days of the Court's Order permitting such filing, and that Defendants'  
3 response thereto shall be filed within fourteen (14) days after the First Amended Complaint is  
4 filed.

5 **IT IS SO STIPULATED.**

6 Dated: August 8, 2017

MISSION LAW FIRM, A.P.C.

7 /s/ Zachary M. Best

8 Zachary M. Best

9 Attorneys for Plaintiff,

Jose Trujillo

10  
11 Dated: August 8, 2017

HOPPE LAW GROUP

12 /s/ Adam Benkoski

13 Theodore W. Hoppe

14 Adam Benkoski

15 Attorneys for Defendants,

16 Fairou American, Inc. dba Ivanhoe Speedy Mart;

Rami Khazal; Manila Khazal and Nadia Aroush

17 **ORDER**

18  
19 Based on the parties' above-stipulation (Doc. 21) and good cause appearing,

20 **IT IS HEREBY ORDERED** that Plaintiff shall file his First Amended Complaint, a  
21 copy of which was filed with the Parties' stipulation, within 5 calendar days of the date this  
22 Order is filed.

23 **IT IS FURTHER ORDERED** that Defendants' response thereto shall be filed within  
24 14 days after the First Amended Complaint is filed.

25 **IT IS SO ORDERED.**

26 Dated: **August 15, 2017**

27 /s/ Sheila N. Oberto

28 UNITED STATES MAGISTRATE JUDGE

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; ORDER