

1 W. CARL HANKLA
2 Trial Attorney, Tax Division
3 U.S. Dept. of Justice
4 Post Office Box 683, Ben Franklin Station
5 Washington, D.C., 20044-0683
6 Telephone: (202) 307-6448
7 Facsimile: (202) 307-0054
8 w.carl.hankla@usdoj.gov

9 Attorney for Plaintiff United States of America

10 STEVEN R. MATHER (CBN 109566)
11 MATHER LAW CORPORATION
12 9777 Wilshire Blvd., Suite 805
13 Beverly Hills, CA 90212
14 Telephone: (310) 278-6088
15 Fax: (310) 278-4805
16 Email: smather@matherlawcorp.com

17 Attorney for Defendant A.A.E.

18 UNITED STATES DISTRICT COURT

19 EASTERN DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,) Case No.: 1:17-CV-00698-AWI-JLT
21)
22 Plaintiff,)
23) STIPULATION TO EXTEND TIME
24) FOR DEFENDANT A.A.E. TO
25 vs.) RESPOND TO PLAINTIFF'S
26) COMPLAINT; ~~PROPOSED~~ ORDER
27) (Doc. 8)
28 ESTATE OF GARY LEON EYRAUD;)
GARY EYRAUD FAMILY TRUST;)
CHAD EYRAUD and KYDARAN)
PASCOE, as Co-Executors of the)
Estate of Gary Leon Eyraud and Co-)
Trustees of the Gary Eyraud Family)
Trust and Individually, and A.A.E.,)
LLC, a California Limited Partnership,)

Defendants.

26 Plaintiff United States of America and Defendant A.A.E., LLC, a
27 California Limited Partnership (A.A.E.), hereby stipulate and request that the
28

1 court enter an order extending the time for Defendant A.A.E. to file an answer
2 or other responsive pleading until August 1, 2017. Good cause exists for this
3 request:

4 1. Plaintiff filed its complaint on May 19, 2017.

5 2. A.A.E. was apparently served properly with a copy of the complaint
6 on May 25, 2017.

7 3. A.A.E.'s counsel was mistakenly notified that service on A.A.E. was
8 accomplished on June 1, 2017.

9 4. On June 20, 2017, counsel for the plaintiff and counsel for A.A.E.
10 discussed the pending matter and counsel for the plaintiff informed counsel for
11 A.A.E. that (1) the responsive pleading deadline was June 15, 2017; and (2)
12 counsel for the plaintiff had previously agreed to an extension of the answer
13 deadline for all defendants with counsel for the other parties.

14 5. Counsel for the plaintiff and A.A.E. are engaged in discussions to
15 resolve this matter without the need for further litigation. An extension of the
16 responsive pleading deadline until August 1, 2017 would allow this dialogue to
17 continue.

18 6. The extended responsive pleading deadline of August 1, 2017 will
19 not affect any deadlines currently set in this matter.
20
21
22
23
24
25
26
27
28

1 The parties respectfully request that the Court so order that the
2 responsive pleading deadline is extended to August 1, 2017.

3
4 Dated: June 21, 2017

5
6 By: _____
7 W. CARL HANKLA
8 United States Department of Justice
9
10 Attorneys for Plaintiff United States
11 of America

12
13 Dated: June 21, 2017

14 By: _____
15 STEVEN R. MATHER
16 Mather Law Corporation
17
18 Attorneys for Defendant A.A.E.

19 **ORDER**

20
21 IT IS SO ORDERED.

22
23 Dated: June 22, 2017

24
25 /s/ Jennifer L. Thurston
26 UNITED STATES MAGISTRATE JUDGE
27
28

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

Pursuant to the parties' stipulation and for good cause shown, defendant A.A.E.'s deadline to file an answer or responsive pleading is extended to August 1, 2017.