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

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11 JOSE TRUJILLO,) No. 1:17-cv-00786-LJO-EPG
12 Plaintiff,) **STIPULATION TO AMEND**
13 vs.) **SCHEDULING ORDER; ORDER**
14 STYLES FOR LESS, INC. dba STYLES FOR)
LESS, et al.,)
15)
16 Defendants.)
17)

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19 Plaintiff, Jose Trujillo (“Plaintiff”), and Defendant, Garrison Tulare LLC (“Garrison,”
20 and together with Plaintiff, “the Parties”)¹, together request that the Court amend the current
21 deadlines set by this Court’s Scheduling Order, dated September 19, 2017 (Dkt. 14)
22 (“Scheduling Order”) as follows:

23 **WHEREAS**, the Scheduling Order sets a deadline to request leave to amend the
24 pleadings of January 12, 2018, and prior to amending his complaint, Plaintiff must inspect the
25 subject property to identify whether any additional barriers to his access exist;

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28 ¹ Defendant Styles for Less, Inc. has filed for bankruptcy and the matter is automatically stayed solely as to that
defendant (Dkt. 15). Styles for Less, Inc. and Garrison are referred to collectively herein as “Defendants.”

1 **WHEREAS**, Plaintiff properly noticed a site inspection which was to take place on
2 October 23, 2017, but Defendants had a scheduling conflict, and Styles for Less, Inc.
3 subsequently filed for bankruptcy, so the date was continued to January 15, 2018;

4 **WHEREAS**, the Parties have been engaging in settlement discussions and are
5 optimistic that a settlement will be reached in the near future;

6 **WHEREAS**, the Parties have agreed to a continuance of the site inspection to allow the
7 Parties to exhaust settlement efforts;

8 **WHEREAS**, the Parties have agreed to continue the deadline to amend the complaint
9 in order for Plaintiff's consultant to conduct the inspection and prepare his findings, for
10 Plaintiff to review those findings and prepare his amended complaint, for Plaintiff to provide
11 the proposed amendment to Garrison so that it can consider stipulating to the amendment, and
12 for Plaintiff to prepare a motion for leave to amend if Garrison does not stipulate;

13 **NOW, THEREFORE, THE PARTIES, THROUGH THEIR RESPECTIVE**
14 **COUNSEL, HEREBY STIPULATE AND AGREE** to amend the Scheduling Order to
15 extend the deadline to request leave to amend the pleadings to March 30, 2018.

16 All other requirements set forth in the Scheduling Order relating to the above shall
17 remain unchanged, including the pre-trial and trial dates.

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19 Dated: January 9, 2018

MISSION LAW FIRM, A.P.C.

20 /s/ Zachary M. Best
21 Zachary M. Best
22 Attorneys for Plaintiff,
Jose Trujillo

23 Dated: January 9, 2018

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

24 /s/ Aaron Langberg
25 Aaron Langberg
26 Attorneys for Defendant
27 Garrison Tulare, LLC
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ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the Scheduling Order, dated September 19, 2017 (Dkt. 15), is amended to extend the deadline for the Parties to seek leave to amend the pleadings to March 30, 2018.

All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates.

IT IS SO ORDERED.

Dated: January 16, 2018

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE