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*TRANSPORTATION, INC.*

16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

19 ROADRUNNER INTERMODAL  
20 SERVICES, LLC, a Delaware limited liability  
21 company,

22 Plaintiff,

23 v.

24 T.G.S. TRANSPORTATION, INC., a  
California corporation, and DOES 1-10,

25 Defendants.

Case No. 1:17-cv-01056-DAD-BAM

**JOINT STIPULATION TO EXTEND  
DEFENDANT T.G.S.  
TRANSPORTATION, INC'S TIME TO  
RESPOND TO COMPLAINT; ORDER**

1 Pursuant to Fed. R. Civ. P. 12(a), Plaintiff Roadrunner Intermodal Services, LLC  
2 (“Roadrunner”) and Defendant T.G.S. Transportation, Inc. (“TGS”) jointly submit this stipulation and  
3 proposed order requesting that the Court extend Defendant’s time to respond to Plaintiff’s Complaint  
4 filed on August 7, 2017. (ECF 1.) The Parties respectfully submit that their request is supported by  
5 good cause. Specifically, pursuant to Paragraph 1.C of the Court’s Standing Order, the Parties have  
6 engaged in a good faith meet and confer regarding a Rule 12 motion contemplated by TGS in response  
7 to the Complaint. They have not, however, been able to reach any agreement ahead of TGS’ deadline  
8 to file a responsive paper on Tuesday, August 29, 2017. *See* Fed. R. Civ. P. 12(a)(1).

9 THEREFORE, IT IS HEREBY STIPULATED by and between Roadrunner and TGS, through  
10 their undersigned counsel, that the deadline for TGS to respond to Roadrunner’s Complaint be  
11 extended to September 1, 2017.

12 Respectfully submitted,

13 GREENBERG TRAURIG LLP

14 Dated: August 28, 2017

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16 By: /s/ Michael D. Lane  
17 Kurt A. Kappes  
18 Michael D. Lane  
19 Sean A. Newland  
20 *Attorneys for Plaintiff, ROADRUNNER*  
21 *INTERMODAL SERVICES, LLC*

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McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP

21 Dated: August 28, 2017

22  
23 By: /s/ Shane G. Smith  
24 Scott J. Ivy  
25 Shane G. Smith  
26 *Attorneys for Defendant, T.G.S.*  
27 *TRANSPORTATION, INC.*

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**SIGNATURE ATTESTATION**

I hereby attest that concurrence has been obtained from Michael Lane, counsel for Plaintiff Roadrunner Intermodal Services, LLC, as indicated by a “conformed” signature (/s/) within this e-filed document.

*/s/ Shane G. Smith*

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Shane G. Smith

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**[Proposed] ORDER**

IT IS SO ORDERED, pursuant to stipulation of the parties and Federal Rule of Civil Procedure 12(a), that the deadline for Defendant T.G.S. Transportation, Inc. to respond to Plaintiff Roadrunner Intermodal Services, LLC’s Complaint is extended to September 1, 2017.

Dated: August 29, 2017

*/s/ Barbara A. McAuliffe*  
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UNITED STATES MAGISTRATE JUDGE