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5 *Global Excel Management, Inc.*

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 **Doctors Medical Center of Modesto,**
12 **Inc.,** a California corporation,

13 Plaintiff,

14 v.

15 **Global Excel Management, Inc.,** a
Canadian corporation; **Mutuelle**
16 **Assurance Des Commerçants Et**
Industriels De France Et Des
17 **Cadres Et Des Salarié De**
L'industrie Et Du Commerce doing
18 **business as MACIF,** a French
corporation; **BNP Paribas S.A.,** a
19 French corporation, and **Does 1**
through 25, inclusive,

20
21 Defendants.
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Case No. 1:20-cv-01425-AWI-BAM

**Stipulation and Order Extending the
Response Deadline to the Complaint**

1 Plaintiff Doctors Medical Center of Modesto, Inc. and Defendant Global Excel
2 Management, Inc. stipulate to extend Global Excel's response to the complaint to
3 November 23, 2020. The Parties request a court order granting this Stipulation.

4 The reasons for this Stipulation are as follows:

5 1. Doctors Medical and Global Excel are currently engaging in settlement
6 discussions that would resolve this entire case. These settlement discussions require
7 obtaining records from various foreign companies.

8 2. The parties are more likely to reach a negotiated resolution with an
9 extension to Global Excel's response deadline. Global Excel intends to file a motion to
10 quash service of the summons for lack of personal jurisdiction. Without an extension,
11 Global Excel would soon be forced to incur fees to file that motion. Incurring those fees
12 would hurt the likelihood of reaching an early negotiated resolution.

13 3. Global Excel was served on September 23, 2020. Its current response
14 deadline to the complaint is October 23, 2020.

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16 Dated: October 7, 2020

WARREN TERZIAN LLP

s/ Dan Terzian

Dan Terzian

Counsel for Defendant

Global Excel Management, Inc.

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21 Dated: October 7, 2020

HELTON LAW GROUP

s/ Kim Worobec (as authorized on October 6)

Kim Worobec

Counsel for Plaintiff

Doctors Medical Center of Modesto, Inc.

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ORDER

Pursuant to the parties' stipulation, the deadline for Defendant Global Excel Management, Inc. to file and serve an answer or other responsive pleading to the complaint is HEREBY EXTENDED to November 23, 2020.

The parties are advised that further extensions will require a showing of good cause. Good cause may consist of the inability to comply with court orders in light of the COVID-19 pandemic. Any such future difficulties should be explained.

IT IS SO ORDERED.

Dated: October 13, 2020

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE