

Attorney for Plaintiff,  
Jose Trujillo

## Page 1

1 Disabilities Act Title III action, which inspection was scheduled to take place on December 9,  
2 2022;

3 **WHEREAS**, Plaintiff's inspection of the subject property was subsequently continued  
4 from December 9, 2022 to February 8, 2023 on the request of Defendant Baldomero V. Cisneros  
5 dba Que Pasa Mexican Café due to an unforeseen emergency;

6 **WHEREAS**, in furtherance of settlement discussions the Parties have agreed that  
7 following Plaintiff's inspection on February 8, 2023 and upon receipt of Plaintiff's consultant's  
8 findings, he will provide a proposed settlement agreement to Defendants which will identify all  
9 injunctive relief he is seeking;

10 **WHEREAS**, the Parties will thereafter continue to engage in good faith settlement  
11 discussions for the purpose of resolving Plaintiff's claims and are optimistic that this matter can  
12 be resolved amicably; and

13 **WHEREAS**, in the meantime the Parties wish to conserve the Court's time and  
14 resources, as well as the Parties' resources in order to promote settlement;

15 **NOW, THEREFORE**, the Parties stipulate and jointly request that the Mandatory  
16 Scheduling Conference currently scheduled for January 23, 2023 be continued to a date on or  
17 after March 23, 2023 at the Court's convenience.

18 **IT IS SO STIPULATED.**

19 Dated: January 16, 2023

MOORE LAW FIRM, P.C.

21 /s/ Tanya E. Moore

22 Tanya E. Moore  
23 Attorney for Plaintiff,  
24 Jose Trujillo

25 Dated: January 17, 2023

CLIFFORD & BROWN

26 /s/ William A. Bruce

27 William A. Bruce  
28 Attorneys for Defendant,  
Baldomero V. Cisneros dba Que Pasa Mexican Cafe

STIPULATION FOR CONTINUANCE OF MANDATORY SCHEDULING CONFERENCE;

~~PROPOSED~~ ORDER

1  
2 Dated: January 16, 2023

McCORMICK, KABOT & LEW APC.

3  
4 /s/ Chad M. Lew

Chad M. Lew

Attorneys for Defendant,  
Heiskell Ranches, L.P.

7  
8 **ORDER**

9 The parties having so stipulated and good cause appearing,

10 IT IS HEREBY ORDERED that the Mandatory Scheduling Conference currently set for  
11 January 23, 2023 is continued to **April 6, 2023 at 9:30 AM in Courtroom 8 (BAM) before**  
12 **Magistrate Judge Barbara A. McAuliffe**. The parties are to file their updated Joint Scheduling  
13 Report including an update on settlement efforts no later than seven days prior to the Mandatory  
14 Scheduling Conference.

15 IT IS SO ORDERED.

16  
17 Dated: **January 18, 2023**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE