

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

CENTER POINT, LLC,

Plaintiff,

V.

IAN CHOU DRI, IN HIS OFFICIAL CAPACITY AS CHIEF EXECUTIVE OFFICER OF THE CALIFORNIA HIGH-SPEED RAIL AUTHORITY, AND IN HIS PERSONAL CAPACITY; AND DOES 1 THROUGH 100, INCLUSIVE.

Defendants.

Case No. 1:24-cv-01600-JLT-EPG

STIPULATION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT;
ORDER

(ECF No. 13)

Plaintiff Center Point, LLC (“Plaintiff”), and Defendant Ian Choudri (“Defendant”), hereby stipulate to provide Plaintiff with leave to file a second amended complaint in the above-captioned action.

WHEREAS, on December 30, Plaintiff filed its Complaint for Civil Penalties, Declaratory, and Injunctive Relief Based on Violations of the Clean Water Act against the California High-Speed Rail Authority (the “Authority”). ECF No. 1.

WHEREAS, on January 15, 2025, Plaintiff filed its First Amended Complaint for Civil Penalties, Declaratory, and Injunctive Relief (the “FAC”). ECF No. 5. With the FAC, Plaintiff

1 named Defendant as defendant in lieu of the Authority, which is no longer a party to the above-
2 captioned case.

3 WHEREAS, on January 17, 2025, counsel for Plaintiff requested that Defendant waive
4 service of summons of the FAC.

5 WHEREAS, on February 13, 2025, Defendant, through counsel, timely served a waiver of
6 service of summons of the FAC pursuant to Rule 4(d) of the Federal Rules of Civil Procedure.

7 WHEREAS, Defendant has until March 18, 2025, to answer or file a Rule 12 motion in
8 response to the FAC. *See Fed. R. Civ. P. 12(1)(A)(ii).*

9 WHEREAS, on February 21, 2025, Defendant, through counsel, submitted a meet-and-confer
10 correspondence to Plaintiff's counsel, detailing the bases on which Defendant intends to move for
11 dismissal of the FAC.

12 WHEREAS, the parties met and conferred on March 11, 2025, and agreed to stipulate to
13 grant Plaintiff leave to file a second amended complaint.

14 WHEREAS, as part of that stipulation, the parties agreed to provide Plaintiff until March 25,
15 2025, to file a second amended complaint.

16 WHEREAS, as part of that stipulation, the parties also agreed to provide Defendant with 30
17 days from the filing of the second amended complaint to file an answer or Rule 12 motion in
18 response to the second amended complaint.

19 THEREFORE, the parties hereby stipulate to grant Plaintiff leave to file a second amended
20 complaint. Plaintiff shall have until March 25, 2025, to file the second amended complaint.
21 Defendant shall have 30 days from the filing of the second amended complaint to file an answer or
22 Rule 12 motion in response to the second amended complaint. Should Plaintiff forego filing a
23 second amended complaint, Defendant shall have until April 24, 2025 to file an answer or Rule 12
24 motion in response to the FAC.

25 IT IS SO STIPULATED.

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1 Dated: March 11, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 JESSICA E. TUCKER-MOHL
5 Supervising Deputy Attorney General

6 */s/ Matthew T. Struhar*
7 MATTHEW T. STRUHAR
8 Deputy Attorney General
9 *Attorneys for Defendant Ian Choudri*

10 WANGER JONES HELSEY

11 Jay A. Christofferson
12 Nicolas R. Cardella
13 *Attorneys for Plaintiff Center Point, LLC*

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1 Plaintiff Center Point, LLC (“Plaintiff”), and Defendant Ian Choudri (“Defendant”) have
2 stipulated to grant Plaintiff leave to file a second amended complaint.

3 IT IS HEREBY ORDERED as follows:

4 1. The stipulation (ECF No. 13) is GRANTED.
5 2. Plaintiff shall have until March 25, 2025, to file a second amended complaint.
6 3. Defendant shall have 30 days from the date the second amended complaint is filed to file
7 an answer or Rule 12 motion in response to the second amended complaint.
8 4. Should Plaintiff forego filing a second amendment complaint, Defendant shall have until
9 April 24, 2025, to file an answer or Rule 12 motion in response to the FAC.

10 IT IS SO ORDERED.
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12 Dated: March 12, 2025

13 /s/ *Eric P. Groj*
14 UNITED STATES MAGISTRATE JUDGE

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