

1 SCOTT N. JOHNSON, ESQ., SBN 166952
2 DISABLED ACCESS PREVENTS INJURY, INC.
3 5150 FAIR OAKS BLVD., SUITE 101
4 PMB #253
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9 Attorney for Plaintiff Scott N. Johnson

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13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF CALIFORNIA**
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16 Scott N. Johnson) Case No. **2:10-cv-01601-GEB-KJM**
17)
18) STIPULATION AND PROPOSED ORDER
19 Plaintiff,) RE: EXTENSION OF TIME UNTIL
20) OCTOBER 20, 2010 FOR DEFENDANTS
21 vs.) CREPE ESCAPE L.L.C.
22) INDIVIDUALLY AND D/B/A THE
23 Crepe Escape L.L.C., et al) CREPE ESCAPE; FRANCESCA L.
24) ZAWAYDEH INDIVIDUALLY AND D/B/A
25) THE CREPE ESCAPE; SHIH-YING TU
26) INDIVIDUALLY AND AS TRUSTEE OF
27) THE TU REVOCABLE FAMILY LIVING
28) TRUST CREATED PURSUANT TO THE
29) TU REVOCABLE LIVING FAMILY
30) TRUST AGREEMENT EXECUTED ON
31) MARCH 30, 2004; JEFFREY TU
32) INDIVIDUALLY AND AS TRUSTEE OF
33) THE TU REVOCABLE FAMILY LIVING
34) TRUST CREATED PURSUANT TO THE
35) TU REVOCABLE LIVING FAMILY
36) TRUST AGREEMENT EXECUTED ON
37) MARCH 30, 2004 TO RESPOND TO
38) COMPLAINT
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41)

42 Pursuant to Local Rule 6-144 (a), Plaintiff Scott N.
43 Johnson and Defendants, Crepe Escape L.L.C. Individually

1 and d/b/a The Crepe Escape; Francesca L. Zawaydeh
2 Individually and d/b/a The Crepe Escape; Shih-Ying Tu
3 Individually and as Trustee of the Tu Revocable Family
4 Living Trust Created pursuant to the Tu Revocable Living
5 Family Trust Agreement executed on March 30, 2004; Jeffrey
6 Tu Individually and as Trustee of the Tu Revocable Family
7 Living Trust Created pursuant to the Tu Revocable Living
8 Family Trust Agreement executed on March 30, 2004, by and
9 through their respective attorneys of record, Scott N.
10 Johnson; Crepe Escape L.L.C.; Francesca L. Zawaydeh; Shih-
11 Ying Tu; Jeffrey Tu (PRO SE), stipulate as follows:
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- 15 1. An extension of time has been previously
16 obtained for Defendants Crepe Escape L.L.C.
17 Individually and d/b/a The Crepe Escape;
18 Francesca L. Zawaydeh Individually and d/b/a
19 The Crepe Escape; Shih-Ying Tu Individually and
20 as Trustee of the Tu Revocable Family Living
21 Trust Created pursuant to the Tu Revocable
22 Living Family Trust Agreement executed on March
23 30, 2004; Jeffrey Tu Individually and as
24 Trustee of the Tu Revocable Family Living Trust
25 Created pursuant to the Tu Revocable Living
26 Family Trust Agreement executed on March 30,
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1 2004 until October 20, 2010 to respond or
2 otherwise plead reference to Plaintiff's
3 complaint.

4 2. Defendants Crepe Escape L.L.C. Individually and
5 d/b/a The Crepe Escape; Francesca L. Zawaydeh
6 Individually and d/b/a The Crepe Escape; Shih-
7 Ying Tu Individually and as Trustee of the Tu
8 Revocable Family Living Trust Created pursuant
9 to the Tu Revocable Living Family Trust
10 Agreement executed on March 30, 2004; Jeffrey
11 Tu Individually and as Trustee of the Tu
12 Revocable Family Living Trust Created pursuant
13 to the Tu Revocable Living Family Trust
14 Agreement executed on March 30, 2004 are
15 granted an extension until October 20, 2010 to
16 respond or otherwise plead reference to
17 Plaintiff's complaint.

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21 3. Defendants Crepe Escape L.L.C. Individually and
22 d/b/a The Crepe Escape; Francesca L. Zawaydeh
23 Individually and d/b/a The Crepe Escape; Shih-
24 Ying Tu Individually and as Trustee of the Tu
25 Revocable Family Living Trust Created pursuant
26 to the Tu Revocable Living Family Trust
27 Agreement executed on March 30, 2004; Jeffrey
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1 Tu Individually and as Trustee of the Tu
2 Revocable Family Living Trust Created pursuant
3 to the Tu Revocable Living Family Trust
4 Agreement executed on March 30, 2004 response
5 will be due no later than October 20, 2010.
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8 IT IS SO STIPULATED effective as of September 20, 2010
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10 Dated: September 21, 2010 /s/Francesca L. Zawaydeh
11 Crepe Escape L.L.C.,
12 Individually and d/b/a
13 The Crepe Escape
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16 Dated: September 21, 2010 /s/Francesca L. Zawaydeh
17 Francesca L. Zawaydeh,
18 Individually and d/b/a
19 The Crepe Escape
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22 Dated: September 21, 2010 /s/Shih-Ying Tu
23 Shih-Ying Tu,
24 Individually and as
25 Trustee of the Tu
26 Revocable Family Living
27 Trust Created pursuant
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to the Tu Revocable
Living Family Trust
Agreement executed on
March 30, 2004

Dated: September 21, 2010

/s/Jeffrey Tu

Jeffrey Tu, Individually
and as Trustee of the Tu
Revocable Family Living
Trust Created pursuant
to the Tu Revocable
Living Family Trust
Agreement executed on
March 30, 2004

Dated: September 20, 2010

/s/Scott N. Johnson

Scott N. Johnson,
Attorney for Plaintiff

IT IS SO ORDERED: that Defendants Crepe Escape L.L.C.
Individually and d/b/a The Crepe Escape; Francesca L.
Zawaydeh Individually and d/b/a The Crepe Escape; Shih-Ying
Tu Individually and as Trustee of the Tu Revocable Family
Living Trust Created pursuant to the Tu Revocable Living

1 Family Trust Agreement executed on March 30, 2004; Jeffrey
2 Tu Individually and as Trustee of the Tu Revocable Family
3 Living Trust Created pursuant to the Tu Revocable Living
4 Family Trust Agreement executed on March 30, 2004 shall
5 have until October 20, 2010 to respond to complaint.

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7 DATED: September 24, 2010



8 GARLAND E. BURRELL, JR.
9 United States District Judge
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