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7 *Specially Appearing for Defendant 18th District  
Agricultural Association.*

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 **PNC EQUIPMENT FINANCE, LLC, a  
11 Delaware limited liability company, as  
12 successor to NATIONAL CITY  
13 COMMERCIAL CAPITAL  
14 CORPORATION,**

**Plaintiff,**

14 **v.**

15 **CALIFORNIA FAIRS FINANCING  
16 AUTHORITY, a California joint powers  
17 authority; 15TH DISTRICT  
18 AGRICULTURAL ASSOCIATION, a state  
19 institution of the State of California; 18TH  
20 DISTRICT AGRICULTURAL  
21 ASSOCIATION, a state institution of the  
22 State of California; 21ST DISTRICT  
23 AGRICULTURAL ASSOCIATION, a state  
24 institution of the State of California; 26TH  
25 DISTRICT AGRICULTURAL  
26 ASSOCIATION, a state institution of the  
27 State of California; and 27TH DISTRICT  
28 AGRICULTURAL ASSOCIATION, a state  
institution of the State of California; 30TH  
DISTRICT AGRICULTURAL  
ASSOCIATION, a state institution of the  
State of California; EL DORADO  
COUNTY FAIR ASSOCIATION, INC., a  
California corporation; LODI GRAPE  
FESTIVAL AND NATIONAL WINE  
SHOW, INC., a California corporation; and  
MADERA COUNTY LIVESTOCK  
ASSOCIATION, a California corporation,**

**Defendants.**

Case No. 2:11-CV-02019-GEB-DAD

**STIPULATION AND ORDER  
EXTENDING TIME FOR 18TH  
DISTRICT AGRICULTURAL  
ASSOCIATION TO RESPOND TO  
COMPLAINT**

**[Local Rules 143 and 144]**

Complaint Served: August 9, 2011  
Current Proposed Response Date:  
November 4, 2011  
New Proposed Response Date:  
November 18, 2011

Hon. Garland E. Burrell, Jr.

1           **WHEREAS**, Plaintiff PNC Equipment Finance, LLC (“PNCEF”) served Defendants 15th  
2 District Agricultural Association, 18th District Agricultural Association, 21st District Agricultural  
3 Association, 26th District Agricultural Association, 27th District Agricultural Association, and  
4 30th District Agricultural Association (collectively "DAA Defendants") with the complaint in the  
5 captioned matter ("Complaint") on or after August 9, 2011;

6           **WHEREAS**, PNCEF and the DAA Defendants stipulated to an initial extension of time  
7 providing the DAA Defendants until September 21, 2011 respond to the Complaint;

8           **WHEREAS**, the Office of the Attorney General for the State of California (Office)  
9 determined that a potential conflict of interest arises from the representation of the DAA  
10 Defendants in this action;

11           **WHEREAS**, the Office obtained an extension of time providing the DAA Defendants until  
12 October 21, 2011 to retain outside counsel and respond to the Complaint;

13           **WHEREAS**, the 15th District Agricultural Association, 21st District Agricultural  
14 Association, 26th District Agricultural Association, 27th District Agricultural Association, and  
15 30th District Agricultural Association have submitted substitutions of counsel naming Harold  
16 Peter Reiland, Jr. of Reiland/law, 6160 Stoneridge Mall Road, Suite 120, Pleasanton, CA 94588,  
17 (925) 400-3300, hal@reilandlaw.com, as their new attorney;

18           **WHEREAS**, the Chief Executive Officer of the 18th District Agricultural Association is  
19 directly negotiating with principals for PNCEF regarding a resolution of the claims set forth in the  
20 Complaint;

21           **WHEREAS**, PNCEF and the 18th District Agricultural Association wish to avoid  
22 unnecessary effort and expense in pursuit of litigation while they work to resolve the dispute  
23 between them;

24           **WHEREAS**, PNCEF and the 18th District Agricultural Association wish to continue their  
25 discussions regarding an informal resolution of the claims set forth in the Complaint;

26           **WHEREAS**, PNCEF and the 18th District Agricultural Association stipulated to an  
27 extension of the October 21, 2011 response date to November 4, 2011; and  
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**WHEREAS**, the 18th District Agricultural Association needs additional time to retain new counsel if its discussions with PNCEF do not result in dismissal of the Complaint.

**IT IS HEREBY STIPULATED**, by and between Plaintiff PNCEF and Defendant 18th District Agricultural Association that the 18th District Agricultural Association may have up through November 18, 2011, inclusive, to answer or otherwise respond to the Complaint.

Dated: November 3, 2011

KAMALA D. HARRIS  
Attorney General of California

By: \_\_\_\_\_//S//\_\_\_\_\_  
ALLAN S. ONO  
Deputy Attorney General  
Specially Appearing for Defendant 18th  
District Agricultural Association

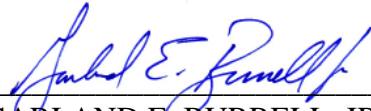
LEVY, SMALL & LALLAS

Dated: November 3, 2011

By \_\_\_\_\_//S//\_\_\_\_\_  
LEO D. PLOTKIN  
Attorneys for Plaintiff PNC Equipment  
Finance, LLC

**IT IS SO ORDERED.**

**Date: 11/3/2011**

  
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GARLAND E. BURRELL, JR.  
United States District Judge