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6 Attorneys for Defendant
ELECTROLUX HOME PRODUCTS INCORPORATED

8 UNITED STATES DISTRICT COURT OF CALIFORNIA
9 EASTERN DISTRICT

11 ROBERT BOVERO,
12 Plaintiff,
13 v.
14 ELECTROLUX HOME PRODUCTS
INCORPORATED,
15 Defendant.

Case No. 2:13-cv-00087-WBS-AC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
AND FIRST AMENDED COMPLAINT
(L.R. 144)**

Complaint served: Jan. 17, 2013
Current response date: Feb. 7, 2013
New response date: March 29, 2013

17
18 Plaintiff ROBERT BOVERO (“Plaintiff”) and Defendant ELECTROLUX HOME
19 PRODUCTS INCORPORATED (“Electrolux”), by and through their respective counsel, hereby
20 stipulate and agree as follows:

21 WHEREAS, on January 16, 2013, Plaintiff filed his initial Complaint in this action;

22 WHEREAS, on January 17, 2013, Plaintiff served Electrolux with a copy of the initial
23 Complaint and Summons in a Civil Action;

24 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Electrolux currently must
25 file and serve a response to Plaintiffs’ initial Complaint on or before February 7, 2013;

26 WHEREAS, the parties have not yet obtained any extensions as to Electrolux’s time to
27 file and serve a response to Plaintiff’s initial Complaint;

1 WHEREAS, Plaintiff has notified Electrolux that he intends to file a First Amended
2 Complaint on or before March 1, 2013 to, at a minimum, add a claim for damages to his cause of
3 action under the California Consumers Legal Remedies Act (“CLRA”);

4 WHEREAS, Electrolux does not wish to incur, and Plaintiff does not wish to cause
5 Electrolux to incur, any burden or expense in responding to the Complaint now on file that will be
6 superseded by the First Amended Complaint when it is filed;

7 WHEREAS, Electrolux also has requested from Plaintiff additional time to prepare a
8 response to Plaintiff’s forthcoming First Amended Complaint, which Plaintiff intends to file on or
9 before March 1, 2013;

10 WHEREAS both parties have agreed that good cause exists to extend the time for
11 Electrolux to respond to Plaintiff’s contemplated First Amended Complaint to and including
12 March 29, 2013 (28 days after Plaintiff intends to file a First Amended Complaint);

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT (1)
14 Plaintiff shall file his First Amended Complaint on or before March 1, 2013; (2) Electrolux need
15 not respond to the Complaint currently on file; and (3) Electrolux shall have to and including
16 March 29, 2013, to move, answer, or otherwise respond to Plaintiff’s First Amended Complaint

17 IT IS SO STIPULATED.

18
19 Dated: January 30, 2013

FARELLA BRAUN + MARTEL LLP

20 By: /s/ C. Brandon Wisoff
21 C. Brandon Wisoff

22 Attorneys for Defendant
ELECTROLUX HOME PRODUCTS INC.

23
24 Dated: January 30, 2013

EPPSTEINER & FIORICA ATTORNEYS, LLP

25 By: /s/ Stuart M. Eppsteiner
26 Stuart M. Eppsteiner
(as authorized on January 30, 2013)


27 Attorneys for Plaintiff ROBERT BOVERO, on
28 behalf of himself and those similarly situated

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ORDER

IT IS SO ORDERED.

Dated: February 26, 2013


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE