```
THOMAS E. FRANKOVICH (State Bar No. 074414)
    THOMAS E. FRANKOVICH,
    A Professional Law Corporation
    4328 Redwood Hwy, Suite 300
 3
    San Rafael, CA 94903
    Telephone:
                 415/674-8600
 4
    Facsimile:
                 415/674-9900
 5
    Attorney for Plaintiff
    MARSHALL LOSKOT
 6
 7
                            UNITED STATES DISTRICT COURT
 8
                           EASTERN DISTRICT OF CALIFORNIA
 9
10
                                               CASE NO. 2:13-cv-00213-JAM-JFM
11
    MARSHALL LOSKOT,
                                               REQUEST AND STIPULATION TO
12
           Plaintiff,
                                               EXTEND TIME FOR FEE APPLICATION;
                                               and ORDER THEREON
13
    v.
14
15
    ANNIE'S PANDA GARDEN; SHIH KUN
    WANG and HONG YING WANG, as Co-
    Trustees under that certain DECLARATION)
16
    OF TRUST executed September 21, 1993;
    and SU NI ZHENG, an individual dba
17
    ANNIE'S PANDA GARDEN,
18
           Defendants.
19
20
21
           The parties by, through their respective attorney of record, request that this Court
     extend the time to for Plaintiff's to submit his Fee Application to January 5, 2015, for the
22
23
    following reasons:
24
           1.
                 Whereas, plaintiff's counsel will be out of the County of Marin and/or State of
25
    California from November 22, 2014 through December 10, 2014, and on vacation from
26
    December 23, 2014 through January 5, 2015; and
27
    ///
28
    ///
    REQUEST AND STIPULATION TO EXTEND TIME TO SUBMIT FEE APPLICATION
    CASE NO. 2:13-cv-00213-JAM-JFM
```

1	2. Whereas , defendants' cou	nsel, as of the date of this stipulation, is presently out of
2	State from November 21, 2014 through December 5, 2014, and his office will be closed from	
3	December 23, 2014 to January 2, 2015; and	
4	3. Whereas , defense counsel Michael Welch, in discussing the settlement aspects	
5	with his clients has to deal with cultural differences.	
6	IT IS SO STIPULATED:	
7	It is stipulated and respectfully requested that the plaintiff has up to and including Januar	
8	5, 2015, to submit a Fee Application.	
9		
10	Dated: November 21, 2014	THOMAS E. FRANKOVICH,
11		A PROFESSIONAL LAW CORPORATION
12	2	By: /s/ Thomas E. Frankovich
13	3	Thomas E. Frankovich Attorney for Plaintiff CRAIG YATES, an
14	1	individual
15		MICHAEL WELCH
16	Dated: November 20, 2014	MICHAEL WELCH Michael Welch & Associates
17	7	
18	3	
19		By:_/s/Michael D. Welch Michael D. Welch
20		Attorney for Defendants ANNIE'S PANDA
21		GARDEN; SHIH KUN WANG and HONG qYING WANG, as Co-Trustees under that certain
22	2	DECLARATION OF TRUST executed September
23	3	21, 1993; and SU NI ZHENG, an individual dba ANNIE'S PANDA GARDEN
24	1	
25	5	
26	5	
27	7	
28	3	
	II	

ORDER PURSUANT TO STIPULATION, IT IS SO ORDERED: That plaintiff shall have up to and including January 5, 2015, to file a Fee Application in the above - captioned action. Dated: November 24, 2014 /s/ John A. Mendez Honorable Judge John A. Mendez United Sates District Court, Eastern District of California