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9 Carl Casperson

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CARL CASPERSON,)	No. 2:13-cv-00481-JAM-KJN
)	
Plaintiff,)	STIPULATION GRANTING PLAINTIFF
)	LEAVE TO FILE FIRST AMENDED
vs.)	COMPLAINT; ORDER
)	
THE GOLDEN 1 CREDIT UNION, et al.,)	
)	
Defendants.)	

18 **WHEREAS**, Plaintiff Carl Casperson (“Plaintiff”) seeks to amend his complaint to
19 allege additional barriers relating to his disability which were identified by Plaintiff’s
20 consultant at the site inspection of the subject property conducted on June 28, 2013, as
21 permitted by *Chapman v. Pier 1 Imports (U.S.), Inc.*, 631 F.3d 939, 944 (9th Cir. 2011), and
22 required by *Oliver v. Ralphs Grocery Co.*, 654 F.3d 903, 909 (9th Cir. 2011);

23 **WHEREAS**, Plaintiff has not unduly delayed the amendment, does not bring it in bad
24 faith, the amendment is not futile, and such amendment does not prejudice Defendants, The
25 Golden 1 Credit Union, a California Corporation; Koraf Corporation, a California Corporation;
26 Douglas Knutsen; and Phyllis Knutsen aka Phyllis Tokerud (collectively “Defendants”), nor
27 does the amendment in any way change the nature of the action;

28 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Plaintiff and

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT;
[PROPOSED] ORDER

1 Defendants, the parties hereto, through their respective attorneys of record, that Plaintiff may
2 file a First Amended Complaint, a copy of which is attached hereto as Exhibit "A." Although
3 Defendants are hereby stipulating to the filing of the First Amended Complaint, Defendants do
4 not concede that the alleged barriers identified in the First Amended Complaint exist or form a
5 basis for Plaintiff to obtain relief in this action.

6 **IT IS FURTHER STIPULATED** that Plaintiff will file his First Amended Complaint
7 within five (5) calendar days of the Court's Order permitting such filing, and that Defendants'
8 response thereto shall be filed within fourteen (14) days after the First Amended Complaint is
9 filed.

10 **IT IS SO STIPULATED.**

11
12 Dated: September 4, 2013

MOORE LAW FIRM, P.C.

13 /s/ Tanya E. Moore

14 Tanya E. Moore
15 Attorneys for Plaintiff
Carl Casperson

16 Dated: September 4, 2013

DOWNEY BRAND LLP

17
18 /s/ Elizabeth B. Stallard

19 Janlynn R. Fleener
20 Elizabeth B. Stallard
21 Attorneys for Defendant
The Golden 1 Credit Union

22 Dated: September 4, 2013

LAW OFFICES OF MATTHEW V. BRADY

23
24 /s/ Matthew V. Brady

25 Matthew V. Brady
26 Attorney for Defendants
Koraf Corporation, Douglas Knutsen, and Phyllis
Knutsen aka Phyllis Tokerud

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ORDER

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that Plaintiff shall file his First Amended Complaint, a copy of which was filed with the Parties' stipulation, within five (5) calendar days of the date this Order is filed.

IT IS FURTHER ORDERED that Defendants' response thereto shall be filed within fourteen (14) days after the First Amended Complaint is filed.

IT IS SO ORDERED.

Dated: September 5, 2013

/s/ John A. Mendez

United States District Court Judge