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10 Attorneys for Defendant
 Service Employees International Union, Local 1000
 11

12 IN THE UNITED STATES DISTRICT COURT
 13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 KOUROSH KENNETH HAMIDI, *et al.*, AND)
 THE CLASS THEY SEEK TO REPRESENT)
 15 Plaintiffs,)
 16 v.)
 17 SERVICE EMPLOYEES INTERNATIONAL)
 UNION, LOCAL 1000, *et al.*;)
 18 Defendants.)
 19)
 20 _____)

No. 2:14-cv-00319-GEB-KJN
**STIPULATED REQUEST FOR
 EXTENSION OF TIME TO RESPOND TO
 COMPLAINT; [PROPOSED] ORDER
 THEREON**
 Hearing Date: N/A
 Time: N/A
 Courtroom: N/A
 Judge: Hon. Garland E. Burrell, Jr.

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1 **STIPULATED REQUEST FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

2 The parties to the above-captioned case, by and through their undersigned counsel of record,
3 hereby respectfully request that defendants be granted until and including April 25, 2014, to respond to
4 plaintiffs' Complaint. In support of that request, the parties state as follows:

5 1. The responsive pleading on behalf of defendant John Chiang, Controller of the State of
6 California, is currently due on February 24, 2014. The requested extension until and including April 25,
7 2014 will afford Secretary Chiang a sixty-day extension of time to respond to the Complaint.

8 2. The responsive pleading on behalf of the other defendant in this case, Service Employees
9 International Union Local 1000, is currently due on March 4, 2014. The requested extension until and
10 including April 25, 2014 will afford Local 1000 a fifty-two-day extension of time to respond to the
11 Complaint.

12 3. No previous extensions of time to respond to the Complaint have been requested or granted in
13 this case.

14 4. The requested extension of time is necessary because defendants have only recently secured
15 counsel to represent them in this case, plaintiffs' Complaint contains numerous factual allegations that
16 counsel must investigate in order to prepare responsive pleadings, and defendants' counsel have
17 numerous litigation commitments that will require their attention in the next sixty days.

18 5. The requested extension of time will not require the Court to reschedule any pretrial dates
19 previously scheduled in this case.

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1 The foregoing is hereby stipulated among the parties in this action, who respectfully request the
2 Court to grant the extension of time.

3 Dated: February 20, 2014.

4 Respectfully submitted,

5 JEFFREY B. DEMAIN
Altshuler Berzon LLP

6 J. FELIX DE LA TORRE
7 ANNE M. GIESE
SEIU Local 1000

8
9 By: /s/ Jeffrey B. Demain
Jeffrey B. Demain

10 Attorneys for Defendant Service Employees International
11 Union, Local 1000

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pending)
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21 By: /s/ Mark Beckington (as authorized on Feb. 20, 2014)
22 Mark Beckington

23 Attorneys for Defendant John Chiang, Controller of the
State of California

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2 pending)
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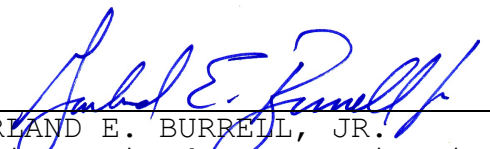
14 By: /s/ W. James Young (as authorized on Feb. 20 , 2014)
15 W. James Young

16 Attorneys for Plaintiffs and the Class They
17 Seek to Represent

18 **[PROPOSED] ORDER**

19 **IT IS SO ORDERED.**

20 Dated: February 25, 2014

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23 GARLAND E. BURRELL, JR.
24 Senior United States District Judge