

Barbara A. Brenner - SB# 142222
Ian J. Barlow – SB# 262213
CHURCHWELL WHITE LLP
1201 K Street, Suite 710
Sacramento, CA 95814
(916) 468-0950 Phone
(916) 468-0951 Fax

fees exempt pursuant to
Government Code §6103

Attorneys for Defendant
GEORGETOWN DIVIDE PUBLIC UTILITY DISTRICT

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

STACY MECKLENBERG,
Plaintiff,

vs.

GEORGETOWN DIVIDE PUBLIC UTILITY
DISTRICT AND DOES 1 THROUGH 10,
Defendants.

Case No.: 2:14-cv-00750-TLN-DAD

**STIPULATION AND ORDER TO EXTEND
TIME TO RESPOND TO COMPLAINT**

[E.D. Cal. Local R. 144(a)]

Action Filed: March 24, 2014

///

///

///

///

///

///

///

///

///

///

///

///

///

Churchwell
White LLP

1 Plaintiff STACY MECKLENBERG (“Plaintiff”) and defendant GEORGETOWN
2 DIVIDE PUBLIC UTILITY DISTRICT (“Defendant”), hereafter collectively referred to as the
3 “Parties”, by and through their respective counsel of record, hereby stipulate and agree that:

4 WHEREAS, Plaintiff filed the above-entitled action on March 24, 2014;

5 WHEREAS, Plaintiff granted Defendant a twenty-eight day extension of time to respond
6 to Plaintiff’s Complaint and the Parties filed their Stipulation for Extension of Time to Respond to
7 Complaint for Damages and Injunctive Relief on April 14, 2014;

8 WHEREAS, Defendant’s response to Plaintiff’s Complaint is currently due on May 16,
9 2014;

10 WHEREAS, Defendant’s counsel requested, and Plaintiff’s counsel recently provided,
11 examples of Plaintiff’s billing statements with enlarged text and Plaintiff’s counsel has agreed
12 that these examples may be shared and discussed with Defendant at an upcoming board meeting
13 in an effort to resolve this litigation;

14 WHEREAS, the Parties do not wish to incur further fees in preparing or opposing
15 responsive motions or pleadings at this time and do not wish to cause the Court to use its time in
16 considering responses to the Complaint if such efforts may be obviated;

17 WHEREAS, Plaintiff and Defendant are therefore in agreement that Defendant’s
18 deadline to answer or otherwise respond to the Complaint may be extended by three weeks to
19 June 6, 2014;

20 WHEREAS, an extension of time will not alter the date(s) of any event or deadline that
21 has been set by the Court; and

22 WHEREAS, good cause exists for this extension to facilitate potential resolution of this
23 matter and conserve the resources of the Parties, counsel and the Court.

24 ///

25 ///

26 ///

27 ///

28 ///

1 **STIPULATION**

2 THEREFORE, the Parties to this action, by and through their respective attorneys,
3 stipulate:

4 1. Defendant's time to respond to Plaintiff's Complaint is extended to June 6, 2014.

5 Respectfully submitted,

6
7 DATED: _May 14, 2014

CHURCHWELL WHITE LLP

8
9 By _____
10 BARBARA A. BRENNER
11 Attorneys for Defendant
12 *Georgetown Divide Public Utility District*

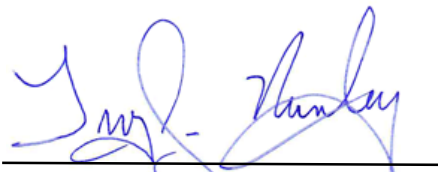
13 DATED: _May 14, 2014

CENTER FOR DISABILITY ACCESS

14
15 By _____
16 PHYLLIS GRACE
17 Attorneys for Plaintiff
18 *Stacy Mecklenberg*

19 **IT IS SO ORDERED.**

20 Dated: May 14, 2014

21
22 
23 _____
24 Troy L. Nunley
25 United States District Judge
26
27
28