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 6 Terrell Moran and Terrell Moran, Inc.

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

9 Concrete Washout Systems, Inc., a)	CASE NO. : 2:14-CV-00830-WBS-CKD
California corporation,)	
)	STIPULATION TO SET ASIDE THE
10 Plaintiff,)	REQUEST FOR ENTRY OF DEFAULT
11 vs.)	AND DEFAULT
)	
12 Terrell Moran, Inc., TMI Services)	
Trucks & Equipment Rentals LLC,)	
13 TMI Concrete Washout Trucks &)	Honorable William B. Shubb
14 Equipment Rentals LLC, Terrell)	Senior U.S. District Judge
Moran, Todd Termini, and)	
15 Does 1 – 100,)	
16 Defendants.)	

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 18 IT IS HEREBY STIPULATED AND AGREED THAT Plaintiff, Concrete Washout
 19 Systems, Inc., by and through its counsel of record, Brian R. Katz, Esq., and Defendants, Terrell
 20 Moran and Terrell Moran, Inc., by and through their counsel of record, Elizabeth S. Ashley, Esq.
 21 of the Ashley Law Group, request that the Court set aside the request for entry of default filed
 22 with the Court on July 11, 2014 and the default entered by this Court on July 16, 2014 against
 23 Defendants Terrell Moran and Terrell Moran, Inc. There have been no previous requests or

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1 stipulations by and between the parties in this regard. The parties agree that the Defendants,
2 Terrell Moran and Terrell Moran, Inc. will have until August 8, 2014 to file an answer to
3 the complaint in the matter.

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5 DATED this 30th day of July, 2014

DATED this 30th day of July, 2014

6 **ASHLEY LAW GROUP**

BRIAN R. KATZ, ESQ.


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8 By: /s/Elizabeth S. Ashley
9 Elizabeth S. Ashley, Esq.
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11 1880 E. Warm Springs Road, Suite 130
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13 Attorney for Defendants
14 Terrell Moran and Terrell Moran, Inc.

By: /s/Brian R. Katz
Brian R. Katz, Esq.
California State Bar No. 88895
4364 Town Center Boulevard, Suite 207
El Dorado Hills, California 95762
Attorney for Plaintiff
Concrete Washout Systems, Inc.

13 **ORDER**

14 IT IS SO ORDERED.

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16 Dated: August 5, 2014

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18 WILLIAM B. SHUBB
19 UNITED STATES DISTRICT JUDGE