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7 Attorneys for Defendant
DELL FINANCIAL SERVICES, LLC

8
9 UNITED STATES DISTRICT COURT OF CALIFORNIA
10 EASTERN DISTRICT

11
12 FLOSERFIDA GARFIL,

13 Plaintiff,

14 v.

15 DELL FINANCIAL SERVICES, LLC,
16 foreign limited liability company; and DOES
17 1 to 10, inclusive,

18 Defendants.

Case No. 14-cv-01729-GEB-AC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT (L.R. 144)**

Complaint filed: July 22, 2014
Complaint served: August 11, 2014
Current response date: September 30, 2014
New response date: October 31, 2014

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20 Plaintiff FLOSERFIDA GARFIL (“Plaintiff”) and Defendant DELL FINANCIAL
21 SERVICES, LLC (“Defendant”), by and through their respective counsel, hereby stipulate and
22 agree as follows:

23 WHEREAS, on July 22, 2014, Plaintiff filed her Complaint in this action;

24 WHEREAS, on August 11, 2014, Plaintiff served Defendant with a copy of the Complaint
25 and Summons in a Civil Action;

26 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Defendant initially needed
27 to file and serve a response to Plaintiff’s Complaint on or before September 2, 2014;

1 WHEREAS, pursuant to stipulation filed on August 22, 2014, the parties extended the
2 time for Defendant's response by 28 days, to and including September 30, 2014, as authorized by
3 Local Rule 144 without Court order;

4 WHEREAS, Defendant has requested from Plaintiff additional time to conduct an initial
5 factual investigation and prepare a response to Plaintiff's Complaint;

6 WHEREAS both parties have agreed that good cause exists to extend the time for
7 Defendant to respond to Plaintiff's Complaint by 31 days, to and including October 31, 2014;

8 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT
9 Defendant shall have an additional 31 days, to and including October 31, 2014, to move, answer,
10 or otherwise respond to Plaintiff's Complaint.

11 IT IS SO STIPULATED.

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13
14 Dated: September 19, 2014

FARELLA BRAUN + MARTEL LLP

15 By: /s/ Alexander M. Porcaro
16 Alexander M. Porcaro

17 Attorneys for Defendant
18 DELL FINANCIAL SERVICES, LLC

19 Dated: September 19, 2014

PRICE LAW GROUP, APC

20 By: /s/ Stuart M. Price (as authorized on Sept. 19, 2014)
21 Stuart M. Price

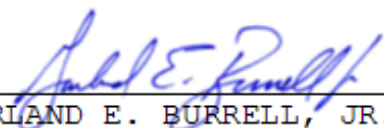
22 Attorneys for Plaintiff
23 FLOSERFIDA GARFIL
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ORDER

IT IS SO ORDERED.

Dated: September 23, 2014



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