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8 Attorney for Plaintiff
 9 **Napoleon Andrews**

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA

12 **Napoleon Andrews,**

13 Plaintiff,

14 v.

15 **PRIDE Industries, Jean Zurbuchen,**
 16 **as an individual and Does 1-10,**
 17 **inclusive,**

18 Defendants.

Case No. 2:14-CV-02154-KJM-AC

Assigned to: Hon. Kimberly J. Mueller
Courtroom: 3

Stipulated Request and ~~Proposed~~
Order To Continue Deadline To File
Post-Trial Briefs Regarding Proposed
Findings Of Fact

19 This stipulation is made by and between Plaintiff Napoleon Andrews (“Plaintiff”), and
 20 Defendants PRIDE Industries and Jean Zurbuchen (“Defendants”), in light of the following facts:

21 WHEREAS, an evidentiary hearing of facts related to the issue of federal enclave jurisdiction
 22 on Travis Air Force Base took place on August 22, 2017 in Department 26 of this Court, in front
 23 of Magistrate Judge Allison Claire;

24 WHEREAS, each of the parties was either present or represented at that hearing;

25 WHEREAS, each of the parties has received and reviewed the transcript of proceedings
 26 which took place on August 22, 2017;

1 WHEREAS, Magistrate Judge Claire has asked that the parties submit briefs with proposed
2 findings of fact relevant to the issue of federal enclave jurisdiction within two weeks of the court
3 reporter's filing of the hearing transcript with the Court;

4 WHEREAS, on September 13, 2017, Magistrate Judge Claire at the request of the parties'
5 stipulation to extend the deadline to file post-trial briefs regarding the findings of fact extended the
6 deadline to September 22, 2017.

7 WHEREAS, on September 20, 2017, the island of Puerto Rico was devastated by the
8 strongest hurricane ever since the depression. Plaintiff's counsel is from the island. All of her
9 family lives on the island and there has been no communication from the mainland United States
10 to the island, thus, she has yet to hear from her 85-year-old mother, sisters, other family members
11 and friends. Plaintiff's counsel has been unable to concentrate and focus on work-related matters
12 since the hurricane landed. An additional three days would assist Plaintiff's counsel in focusing
13 the respective brief to contested proposed findings of fact.

14 In the interest of efficiency and focusing the Court's attention on contested facts, the Parties
15 hereby **AGREE AND STIPULATE AND JOINTLY REQUEST** that the Court find good
16 cause to continue the deadline for submission of final briefs by one week – to be filed on or
17 before **September 25, 2017**.

18 Dated: September 22, 2017

Respectfully submitted,

THE ROSA LAW GROUP

By: /s/Andrea Rosa

ANDREA ROSA
Attorney for Plaintiff
Napoleon Andrews

23 Dated: September 22, 2017

FREEMAN MATHIS & GARY, LLP

By: /s/ Melissa M. Whitehead


David M. Daniels
Melissa M. Whitehead
Attorneys for Defendant PRIDE
INDUSTRIES and JEAN ZURBUCHEN

1 **ORDER**

2 Based on the Stipulation of the parties, and good cause appearing therefor, **IT IS**
3 **ORDERED** that the filing and service deadline for filing the Post-Trial Briefs, currently set for
4 September 22, 2017, be and hereby is continued to September 25, 2017.

5 **IT IS SO ORDERED.**

6 DATED: September 22, 2017.

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9 ALLISON CLAIRE
10 UNITED STATES MAGISTRATE JUDGE
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