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5 Attorneys for Plaintiff
 6 Kristine Cloud as Trustee
 of the Dorothy I. Gavle Revocable Trust
 7

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 KRISTINE CLOUD AS TRUSTEE)	Case No. 2:14-cv-02308-TLN-AC
OF THE DOROTHY I. GAVLE)	
12 REVOCABLE TRUST,)	STIPULATION AND ORDER TO
)	CONTINUE DUE DATE OF JOINT
13 Plaintiff,)	STATUS REPORT
)	
14 vs.)	
)	
15 DARYL VAN NESS, ROUND PRAIRIE)	
LUTHERAN CHURCH and DOES 1-100,)	
16)	
Defendants.)	

17
 18 Plaintiff Kristine Cloud, as trustee of the Dorothy I. Gavle Revocable Trust, defendant
 19 Daryl Van Ness and specially appearing defendant Round Prairie Lutheran Church (the
 20 “Church”), by and through their counsel, hereby stipulate and agree as follows:

- 21 1. Plaintiff filed the instant action on October 2, 2014;
- 22 2. On October 3, 2014, the Court issued its Order Requiring Joint Status Report
- 23 (“Order”). Pursuant to the Order, a Joint Status Report is currently due on or
- 24 before Friday, December 12, 2014;
- 25 3. On November 21, 2014, the Church filed a motion to dismiss the complaint against
- 26 it pursuant to Federal Rule of Civil Procedure 12(b)(2) on the basis of lack of
- 27 personal jurisdiction and Federal Rule of Civil Procedure 12(b)(3) on the basis of
- 28 STIPULATION AND ORDER TO CONTINUE DUE DATE OF JOINT STATUS REPORT

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improper venue (the “Motion”);

- 4. The Church does not submit, and is not submitting, to the jurisdiction of this Court through signing this stipulation and is only specially appearing to continue the due date of the Joint Status Report so as to avoid irreparable harm in having to litigate this action. This stipulation shall not be construed as a waiver of the Church’s right to contest personal jurisdiction or a waiver of the Motion itself;
- 5. The Motion is set for hearing on January 29, 2015;
- 6. All parties agree that the requested continuance of the due date of the Joint Status Report will not result in prejudice to any party to this action; and
- 7. That the Court, therefore, continue the due date for filing the Joint Status Report until 30 days after issuance of the Court’s ruling on the Motion.

NOW THEREFORE, the parties stipulate that the due date for the Joint Status Report be continued to 30 days after issuance of the Court’s ruling on the Motion.

IT IS SO STIPULATED.

DATED: December 9, 2014

JONES & DYER

By: /s/ Steven A. Scordalakis
GREGORY F. DYER
STEVEN A. SCORDALAKIS
Attorneys for Plaintiff
Kristine Cloud as Trustee of the
Dorothy I. Gavle Revocable Trust

DATED: December 9, 2014

NORMAN ROOS LLP

By: /s/ Jan M. Roos
JAN M. ROOS
Attorney for Defendant Daryl Van Ness

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DATED: December _9, 2014

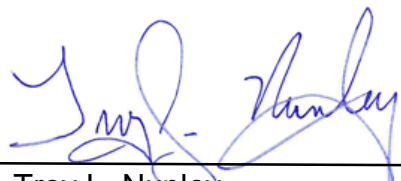
WEINTRAUB TOBIN CHEDIAK
COLEMAN GRODIN law corporation

BY: /s/ Shauna N. Correia
EDWARD J. COREY
SHAUNA N. CORREIA
Attorneys for Specially Appearing
Defendant Round Prairie Lutheran
Church

ORDER

IT IS SO ORDERED.

Dated: December 11, 2014



Troy L. Nunley
United States District Judge