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8 Attorneys for Plaintiff
 9 BAJA INSURANCE SERVICES, INC.

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17 Attorneys for Defendant
 18 PLANO INSURANCE GROUP, INC., f/k/a SHANZE
 19 ENTERPRISES, INC., f/d/b/a BAJA AUTO INSURANCE

20 **UNITED STATES DISTRICT COURT**
 21 **EASTERN DISTRICT OF CALIFORNIA**

22 BAJA INSURANCE SERVICES, INC., a
 23 California corporation,

24 Plaintiff,

25 v.

26 SHANZE ENTERPRISES, INC. d/b/a
 27 BAJA AUTO INSURANCE, and DOES 1
 28 to 10,

Defendants.

Case No.: 2:14-cv-02423-KJM-AC

**JOINT STIPULATION TO EXTEND
 TIME AND ORDER**

1 **TO THE UNITED STATES DISTRICT COURT, ALL INTERESTED PARTIES, AND**
2 **THEIR ATTORNEYS:**

3 Pursuant to the Court's Order, under Dkt. No. 50, Plaintiff and Defendant hereby enter
4 into this stipulation and request that the Court permit the parties to file their respective
5 pleadings as follows:

- 6 1. Plaintiff shall file its Second-Amended Complaint on or before April 28, 2016;
- 7 2. Defendant Plano Insurance Group, Inc. shall file its counterclaim on or before April 28,
8 2016;
- 9 3. Defendant shall file its answer or other responsive pleading within 21 days of receipt of
10 the Summons and Second-Amended Complaint; and
- 11 4. Plaintiff shall file its responsive pleading within 21 days of the filing of counterclaim.

11 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

12 Dated: April 8, 2016

LAW OFFICES OF SALAR ATRIZADEH

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15 By: /s/ Salar Atrizadeh

SALAR ATRIZADEH, ESQ.

Attorneys for Plaintiff

BAJA INSURANCE SERVICES, INC.

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18 Dated: April 8, 2016

**WILSON ELSER MOSKOWITZ EDELMAN &
DICKER, LLP**

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21 By: /s/ Francis Torrence

FRANCIS TORRENCE, ESQ.

Attorneys for Defendant

PLANO INSURANCE GROUP, INC.

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24 **IT IS SO ORDERED, PURSUANT TO STIPULATION.**

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26 DATED: April 14, 2016

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UNITED STATES DISTRICT JUDGE