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Attorneys for Plaintiffs STORMWATER SYSTEMS, INC., dba SAFE DRAIN INC., SAFE DRAIN INTERNATIONAL, INC., and JOHN DEMING

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

STORMWATER SYSTEMS INC., dba SAFE DRAIN INC., SAFE DRAIN INTERNATIONAL INC., and JOHN DEMING,

Plaintiffs,

v.

DOUGLAS REITMEYER, MICHAEL BRASBERGER SR., MICHAEL BRASBERGER JR., and ASHMB, LLC,

Defendants.

Case No.: 2:14-cv-02472-MCE-CKD

STIPULATION EXTENDING TIME TO FILE DISPOSITIONAL DOCUMENTS

On August 6, 2015, the Court entered the following minute order: "After settlement negotiations conducted, the parties reached a verbal settlement agreement. The court read the terms of the settlement for the record. All parties agreed to the terms as stated. Dispositional documents to be filed within 14 days." (ECF No. 81.) The parties were therefore required to file

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their dispositional documents on August 20, 2015.

Plaintiffs' counsel and counsel for Defendants Michael Brasberger Sr., Michael Brasberger Jr., and ASHMB, LLC, worked diligently to finalize the terms of the dispositional documents and final settlement agreement by this date. The parties continued to encounter issues related to the terms of the agreement, and on August 19, 2015, counsel received communications for the first time from counsel representing third party Benjamin "Buzz" Holmes. Counsel for Mr. Holmes raised additional issues that have slowed the process for all parties.

Counsel for Plaintiffs and the Brasberger Parties spoke with this Court on Friday, August 21, 2015, and communicated that a further extension until Monday, August 24, 2015, was needed because of these additional issues.

Plaintiffs and the Brasberger Parties are in agreement as to all terms of the agreement. However, because Mr. Holmes and Mr. Reitmeyer have not yet communicated that they agree to the terms of the final settlement agreement, the parties are unable to file dispositional documents on August 24, 2015.

Accordingly, it is HEREBY STIPULATED by and between Plaintiffs Stormwater Systems Inc., Safe Drain International, Inc., and John Deming, Defendants Michael Brasberger Sr., Michael Brasberger Jr., ASHMB, LLC, and Douglas Reitmeyer, that the parties shall have until Thursday, August 27, 2015, to file dispositional documents with this Court.

SO STIPULATED.

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DATED: August 24, 2015 DOWNEY BRAND LLP

By: /s/ Avalon Johnson Fitzgerald

AVALON JOHNSON FITZGERALD Attorney for Plaintiffs Stormwater Systems, Inc., Safe Drain International, Inc., and John Deming

DATED: August 24, 2015 SESSIONS & ASSOCIATES

By: /s/ Lewis Sessions (as authorized on 8/24/15)

LEWIS SESSIONS

Attorney for Defendants Michael Brasberger Sr., Michael Brasberger Jr., and ASHMB, LLC

DATED: August 24, 2015 DOUGLAS REITMEYER

By: /s/ *Douglas Reitmeyer* (as authorized on 8/24/15)

DOUGLAS REITMEYER

Pro Se

ORDER

For the reasons set forth above, and good cause appearing, the parties shall have until Thursday, August 27, 2015, to file dispositional documents with this Court.

IT IS SO ORDERED.

Dated: August 25, 2015

KENDALL J. NEWMAN

UNITED STATES MAGISTRATE JUDGE

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