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6 Attorneys for Defendant
7 BEL AIR MART

8
9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 JIMMY KUANG, an individual, Civil Action No.: 2:15-cv-00160
12 Plaintiff,
13 v. **STIPULATION AND ORDER TO**
14 **EXTEND TIME TO RESPOND TO**
15 **COMPLAINT**

15 BEL AIR MART; a California Corporation;
16 and DOES 1 through 50, inclusive,
17 Defendant.

Complaint Filed: 1/20/15

18 **I**
19 **INTRODUCTION**

20 Plaintiff alleges wrongful termination in violation of the Labor Management Relations Act
21 (LMRA) against his former employer, Defendant BEL AIR MART. Defendant contends that
22 Plaintiff's suit has been filed beyond the statute of limitations. Plaintiff has requested additional
23 time to fully analyze this issue.

24 **II**
25 **STIPULATION**

26 The Parties hereby stipulate as follows:

- 27 1. Plaintiff desires additional time to analyze the arguments raised by defendant,
28 which plaintiff understands will form the basis of a motion to dismiss should plaintiff fail to

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STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT; AND ORDER THEREON

1 dismiss his case, with prejudice;

2 2. In light of plaintiff's need for additional time to analyze this issue, and in an effort
3 to avoid unnecessary expenses and litigation, the parties hereby stipulate to an extension of time
4 for defendant to respond to the Complaint, which shall now be due by April 7, 2015.

5 3. Neither party is prejudiced by this extension.

6 **III**

7 **CONCLUSION**

8 For the foregoing reasons, the parties ask this court to grant an order extending defendant's
9 deadline to respond to the Complaint to April 7, 2015.

10 **IV**

11 **ATTESTATION**

12 I hereby attest that I have permission from plaintiff counsel to file this stipulation.

13
14 Dated: March 6, 2015

PORTER SCOTT
A PROFESSIONAL CORPORATION

15
16 By /S/ Lindsay A. Goulding
17 Lindsay A. Goulding
18 Attorney for Defendant Raley's

19 Dated: March 6, 2015

TASHROUDIAN LAW GROUP

20 By /S/ Mona Tashroudian
21 Mona Tashroudian
22 Attorney for Plaintiff Jimmy Kuang

23 **ORDER**

24 After considering the parties' Stipulation and GOOD CAUSE SHOWN, it is ordered that
25 Defendant's deadline to respond to the Complaint shall be extended to April 7, 2015.

26 Dated: March 6, 2015

 /s/ John A. Mendez
27 Hon. John A. Mendez
28 U.S. District Court Judge