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21 **UNITED STATES DISTRICT COURT**

22 **EASTERN DISTRICT OF CALIFORNIA**

23 RICARDO CASTILLO, individually and on
behalf of all others similarly situated,

24 Plaintiff,

25 v.

26 ADT LLC and DOES 1–100, inclusive,

27 Defendants.
28

Case No. 2:15-cv-00383-WBS-DAD

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DATE FOR
DEFENDANT ADT LLC TO AMEND
ANSWER AS OF RIGHT**

1 Pursuant to Rules 137, 143 and 144 of the Local Rules of this Court, Plaintiff Ricardo
2 Castillo (“Plaintiff”) and Defendant ADT LLC (“Defendant”) (collectively, the “Parties”)
3 respectfully submit this Joint Stipulation and [Proposed] Order Continuing Defendant’s Date to
4 Amend its Answer as of Right Pursuant to Fed. R. Civ. Proc. 15(a)(1)(A).

5 WHEREAS, Defendant filed and served (via ECF) an Answer to Plaintiff’s Complaint on
6 March 20, 2015.

7 WHEREAS, Defendant’s time to amend its Answer as of right pursuant to Fed. R. Civ.
8 Proc. 15(a)(1)(A) is April 10, 2015.

9 WHEREAS, Plaintiff conferred with Defendant regarding Defendant’s affirmative defenses
10 pleaded in the Answer, requesting that Defendant amend such defenses to state additional detail,
11 and that Defendant consider withdrawing (without prejudice) defenses as to which such additional
12 detail could not be stated at present.

13 WHEREAS, Defendant has agreed to file an Amended Answer pursuant to this stipulation,
14 but requests an additional fourteen (14) days to do so.

15 WHEREAS, Plaintiff stipulates to such an extension of time.

16 WHEREAS, no extensions of time have been requested or given to either of the Parties
17 with regard to the amendment of pleadings.

18 WHEREAS, the Parties stipulate to such an extension to avoid the potential need for
19 motion practice concerning Defendant’s affirmative defenses.

20 THEREFORE, the Parties stipulate that Defendant should have until April 24, 2015 to
21 amend its Answer as of right pursuant to Fed. R. Civ. Proc. 15(a)(1)(A).

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23 DATED: April 7, 2015

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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By: /s/ Christopher M. Ahearn

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Linda Claxton
Christopher M. Ahearn

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Attorneys for Defendant
ADT LLC

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DATED: April 7, 2015

HARRIS & RUBLE

By: /s/Alan Harris (as authorized on April 7, 2015)
Alan Harris
Priya Mohan

Attorneys for Plaintiff
RICHARD CASTILLO

DATED: April 7, 2015

NORTH BAY LAW GROUP

By: /s/David S. Harris (as authorized on April 7, 2015)
David S. Harris

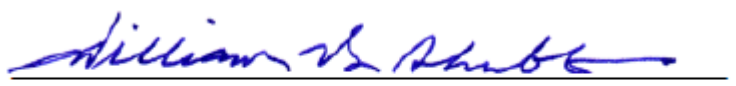
Attorneys for Plaintiff
RICHARD CASTILLO

ORDER

Defendant's time to amend its Answer to Plaintiff's Complaint is continued from April 10, 2015 to April 24, 2015.

IT IS SO ORDERED.

Dated: April 7, 2015


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE