

1 KEITH CHRESTIONSON (SBN: 130936)
 2 RAMON A. MIYAR (SBN: 284990)
 3 FOX ROTHSCHILD LLP
 345 California Street, Suite 2200
 San Francisco, CA 94104
 Tel: 415.364.5558
 Fax: 415.391.4436
 e-mail: kchrestionson@foxrothschild.com
 rmiyar@foxrothschild.com

7 Attorneys for Defendant
 FIRST DATA CORPORATION

9
 10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**
 12 **SACRAMENTO DIVISION**

13 DAVID KNOX,
 14
 15 Plaintiff,
 16
 17 v.
 18 FIRST DATA CORPORATION, and
 DOES 1-25,
 19
 20 Defendants.

Case No. 2:15-cv-00393-JAM-KJN

**STIPULATION FOR EXTENSION OF TIME
 FOR DEFENDANT TO ANSWER, MOVE,
 OR OTHERWISE PLEAD IN RESPONSE TO
 PLAINTIFF'S COMPLAINT AND ORDER**

Complaint Filed: November 12, 2014
 Removed: February 19, 2015

FOX ROTHSCHILD LLP
 345 California Street, Suite 2200
 San Francisco, CA 94104
 Telephone: (415) 364-5540 Fax: (415) 391-4436

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Pursuant to General Local Rule 144(a), it is hereby STIPULATED and AGREED by and between counsel for Plaintiff, David Knox, and Defendant, First Data Corporation, that Defendant shall have 28 days from April 16, 2015 to answer, move or otherwise plead in response to the Complaint.

The response to the Complaint is currently due on April 16, 2015 pursuant to an earlier extension. Only two prior extensions have been granted in this matter. During the prior two extensions, counsel for the plaintiff has been diligently attempting to get all of the possible claimants to certain funds in the possession of First Data Corporation to release those claims so that plaintiff and First Data Corporation could hopefully amicably resolve this matter with total finality. The parties seek a further extension so that counsel for the plaintiff can continue to seek the release by one last claimant to certain funds so that the parties can avoid pursuing the time and expense associated with an interpleader or otherwise having to litigate these proceedings. The parties believe that the additional time will aid in determining whether the release of the final claimant can be obtained before a responsive pleading is required. Pursuant to this stipulation,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Defendant shall file its response no later than **May 8, 2015**.

FOX ROTHSCHILD LLP

LAW OFFICES OF RANDY E. THOMAS

/s/ Ramon A. Miyar
KEITH CHRESTIONSON
RAMON A. MIYAR
345 California Street, Suite 2200
San Francisco, CA 94104

/s/ Jeannine I. Maldonado
RANDY E. THOMAS
JEANNINE I. MALDONADO
18826 N. Lower Sacramento Road, Ste. G
Woodbridge, CA 95258

Attorneys for Defendant

Attorneys for Plaintiff

Dated: April 10, 2015

Dated: April 10, 2015

SO ORDERED

Dated: April 10, 2015

/s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE

FOX ROTHSCHILD LLP
345 California Street, Suite 2200
San Francisco, CA 94104
Telephone: (415) 364-5540 Fax: (415) 391-4436