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Attorneys for Defendant Rainbow USA, Inc.

16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**

PAKIZA A. ALI, on behalf of herself and all others similarly situated, and on behalf of the general public,

Plaintiff,

vs.

RAINBOW USA INC. WHICH WILL DO BUSINESS IN CALIFORNIA AS NEW YORK RAINBOW USA INC., AND DOES 1 THROUGH 10, INCLUSIVE,

Defendants.

Case No. 2:15-CV-00418-JAM-CKD

**JOINT STIPULATION AND ORDER
 TO EXTEND TIME FOR PLAINTIFF
 TO FILE A MOTION TO REMAND
 CASE TO STATE COURT**

Case Removed: February 26, 2015
 Trial Date: None Set
 Judge: Hon. John A. Mendez

1 Plaintiff PAKIZA A. ALI (“Plaintiff”) and Defendant RAINBOW USA INC.
2 (“Defendant”) hereby stipulate and agree that Plaintiff’s deadline to file a motion to
3 remand the instant case on the basis of any defect other than lack of subject matter
4 jurisdiction pursuant to 28 U.S.C. § 1447(c) be extended by 30 days as follows:

5 WHEREAS, on or around February 24, 2015, Defendant removed the instant
6 action to District Court;

7 WHEREAS, Plaintiff intends to file a Motion to Remand this case to State
8 Court;

9 WHEREAS, the deadline to file a Motion to Remand is March 25, 2015;

10 WHEREAS, Defendant intends to oppose Plaintiff’s Motion to Remand;

11 WHEREAS, the Parties are currently discussing settlement of the entire case
12 but need additional time to schedule a private mediation and to conduct certain
13 limited, informal discovery in conjunction with that mediation; and

14 WHEREAS, in order to save both parties on costs and fees in filing and
15 opposing the Plaintiff’s Motion to Remand, the parties need more time to assess the
16 settlement of the entire case.

17 THEREFORE, the Parties to the above-captioned matter hereby stipulate and
18 agree as follows:

- 19 1. Plaintiff’s deadline to file her Motion to Remand to be extended by
20 thirty (30) days.
- 21 2. The new deadline for Plaintiff to file her Motion to Remand will be
22 April 24, 2015.

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1 IT IS SO STIPULATED ON THE DATES INDICATED BELOW.

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DATED: March 17, 2015

By: /s/ Roman Otkupman
Roman Otkupman
Attorney for Plaintiff Pakiza A. Ali

DATED: March 17, 2015

LITTLER MENDELSON, P.C.

By: /s/ Kelsey E. Papst
Kelsey E. Papst
Attorneys for Defendant
Rainbow USA Inc.

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ORDER

Good cause appearing, and pursuant to the stipulation of the parties, IT IS
HEREBY ORDERED that:

1. Plaintiff's deadline to file her Motion to Remand to be extended by thirty (30) days.
2. The new deadline for Plaintiff to file her Motion to Remand will be April 24, 2015.

DATED: March 18, 2015

/s/ John A. Mendez

The Hon. John A. Mendez