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9 Attorneys for Defendant
10 PARK MANAGEMENT CORP.

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

13 SCOTT JOHNSON,

14 Plaintiff,

15 v.

16 PARK MANAGEMENT CORP., a
17 California corporation; and DOES 1-10,

18 Defendants.

Case No. 2:15-CV-00487-WBS-CKD

**STIPULATION TO EXTEND TIME
FOR DEFENDANT PARK
MANAGEMENT CORP. TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

[Complaint Filed: March 5, 2015]

1 Defendant Park Management Corp. ("Defendant") and Plaintiff Scott
2 Johnson, an individual ("Plaintiff"), through their respective, undersigned counsel,
3 stipulate to extend the time for Defendant to file a response to Plaintiff's Complaint.

4 Plaintiff filed his complaint on March 5, 2015 and served Defendant with the
5 complaint on March 9, 2015. Defendant must file and serve an answer or otherwise
6 respond to Plaintiff's Complaint by March 30, 2015.

7 Defendant needs additional time to investigate adequately the claims alleged
8 in this matter, as well as all potential defenses and/or counterclaims to those claims, and
9 the parties require additional time to discuss possible settlement of claims.

10 Accordingly, for good cause appearing, the parties now jointly move the
11 Court for an order extending the time for Defendant to file a response to Plaintiff's
12 Complaint through and including April 13, 2015.

13 Counsel for Plaintiff has assented to the electronic filing of this Joint Motion
14 and requested that Defendant's counsel submit an electronic signature on his behalf.

15
16 Dated: March 24, 2015

17 CENTER FOR DISABILITY ACCESS

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19 By _____ */s/ Phyl Grace*
20 MARK POTTER
21 PHYL GRACE

22 Attorneys for Plaintiff
23 SCOTT JOHNSON
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1 Dated: March 24, 2015

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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4 By /s/ Hayley S. Grunvald
5 HAYLEY S. GRUNVALD

6 Attorneys for Defendant
7 PARK MANAGEMENT CORP.
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The Court, having reviewed the Joint Stipulation of plaintiff SCOTT JOHNSON and defendant PARK MANAGEMENT CORP. and finding good cause therefor;

IT IS HEREBY ORDERED that defendant PARK MANAGEMENT CORP. has until April 13, 2105 to respond to the Complaint.

IT IS SO ORDERED.

Dated: March 24, 2015



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE