1 2 3 4 5 6 7 8	 SHEPPARD, MULLIN, RICHTER & HAM A Limited Liability Partnership Including Professional Corporations HAYLEY S. GRUNVALD, Cal. Bar No. 22 12275 El Camino Real, Suite 200 San Diego, California 92130-2006 Telephone: 858.720.8900 Facsimile: 858.509.3691 Attorneys for Defendant PARK MANAGEMENT CORP. 			
9 10 11	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION			
 12 13 14 15 16 17 12 	SCOTT JOHNSON, Plaintiff, v. PARK MANAGEMENT CORP., a California corporation; and DOES 1-10, Defendants.	Case No. 2:15-CV-00487-WBS-CKD SECOND JOINT STIPULATION TO EXTEND TIME FOR DEFENDANT PARK MANAGEMENT CORP. TO RESPOND TO PLAINTIFF'S COMPLAINT [Complaint Filed: March 5, 2015]		
 18 19 20 21 22 23 		_		
24 25 26				
27 28				
		ND STIPULATION TO EXTEND TIME FOR DEFENDANT ENT CORP. TO RESPOND TO PLAINTIFF'S COMPLAINT		

1	Defendant Park Management Corp. ("Defendant") and Plaintiff Scott		
2	Johnson, an individual ("Plaintiff") (jointly "the Parties"), through their respective,		
3	undersigned counsel, stipulate for a second time to extend the time for Defendant to file a		
4	response to Plaintiff's Complaint.		
5	Plaintiff filed his complaint on March 5, 2015 and served Defendant with the		
6	complaint on March 9, 2015. Defendant was required to file and serve an answer or		
7	otherwise respond to Plaintiff's Complaint by March 30, 2015. The Parties stipulated to		
8	allow Defendant to file a response to Plaintiff's Complaint through and including April 13,		
9	2015.		
10	The Parties request a second extension of time for Defendant to respond to		
11	Plaintiff's Complaint. The Parties are in the process of discussing settlement of the matter		
12	and need additional time to conduct settlement negotiations to determine if a settlement is		
13	possible of the instant matter. The Parties stipulated to allow Defendant to file a response		
14	to Plaintiff's Complaint through and including April 20, 2015.		
15	Accordingly, for good cause appearing, the parties now jointly move the		
16	Court for an order extending the time for Defendant to file a response to Plaintiff's		
17	Complaint through and including April 20, 2015.		
18	Counsel for Plaintiff has assented to the electronic filing of this Joint Motion		
19	and requested that Defendant's counsel submit an electronic signature on his behalf.		
20			
21	Dated: April 13, 2015		
22	CENTER FOR DISABILITY ACCESS		
23			
24	By /s/ Mark Potter		
25	MARK POTTER PHYL GRACE		
26			
27	Attorneys for Plaintiff SCOTT JOHNSON		
28	-1-		
	SMRH:204141918.1 SECOND STIPULATION TO EXTEND TIME FOR DEFENDANT PARK MANAGEMENT CORP. TO RESPOND TO PLAINTIFF'S COMPLAINT		

1	Dated: April 13, 2015	
2		SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
3		
4		By /s/ Hayley S. Grunvald
5		HAYLEY S. GRUNVALD
6		Attorneys for Defendant
7		PARK MANAGEMENT CORP.
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
	SMRH:204141918.1	-2- SECOND STIPULATION TO EXTEND TIME FOR DEFENDANT
		PARK MANAGEMENT CORP. TO RESPOND TO PLAINTIFF'S COMPLAINT

1	ORDER		
2	The Court, having reviewed the Joint Stipulation of plaintiff SCOTT		
3	JOHNSON and defendant PARK MANAGEMENT CORP. and finding good cause		
4	therefor;		
5	IT IS HEREBY ORDERED that defendant PARK MANAGEMENT CORP.		
6	has until April 20, 2105 to respond to the Complaint.		
7	IT IS SO ORDERED.		
8			
9	Datade April 15, 2015		
10	Dated: April 15, 2015		
11	WILLIAM B. SHUBB UNITED STATES DISTRICT JUDGE		
12			
13			
14			
15			
16			
17			
18			
19 20			
20			
21 22			
22			
23			
25			
26			
27			
28			
	-3- SMRH:204141918.1 SECOND STIPULATION TO EXTEND TIME FOR DEFENDANT		
	PARK MANAGEMENT CORP. TO RESPOND TO PLAINTIFF'S COMPLAINT		