| California Re | publican Party v. Asian American Small Business Political A | ction Committee | Doc. 12 |
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| 5 | Telephone: (424) 901-6690 Facsimile: (424) 901-1433 | | |
| 6 | Attorneys for Defendant Asian American | | |
| 7 | Small Business Political Action Committee | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | EASTERN DISTRICT OF CALIFORNIA | | |
| 10 | SACRAMENTO DIVISION | | |
| 11 | | | |
| 12 | CALIFORNIA REPUBLICAN PARTY, | Case No. 2:15-CV-00505-TLN-AC | |
| 13 | | CTIDIII ATION EOD TIIIDD EVTENCIO | NT. |
| 14 | Plaintiff, | STIPULATION FOR THIRD EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO COMPLAINT; ORDER | N |
| 15 | vs. | THEREON | |
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| 17 | ASIAN AMERICAN SMALL BUSINESS POLITICAL ACTION COMMITTEE, | | |
| 18 | Defendant. | | |
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| 28 | Stipulation and Order To Further Extend - 1 - Time To Respond To Complaint | | |
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Plaintiff California Republican Party and Defendant Asian American Small Business Political Action Committee, through their respective counsel of record, hereby stipulate that Defendant shall have a fourteen-day extension of time up through, and including, May 4, 2015, in which to plead or otherwise respond to the complaint. This is the third such extension sought. Defendant and Plaintiff previously stipulated to two extensions of ten days each, the second of which extended until April 20, 2015, the deadline for Defendant to plead or otherwise respond to the complaint.

The Court's approval of this third stipulated extension is respectfully requested as the parties appear close to reaching a settlement resolving all claims and disputes involved in this lawsuit, which asserts four claims against Defendant for trademark infringement. The parties contemplate that the settlement agreement will also include provisions intended to avoid future disputes of the kind giving rise to this lawsuit.

The parties believe that they can, by May 4, 2015, complete the negotiation, documentation, and execution of a definitive agreement, which would then result in the dismissal of this lawsuit. The total extension of time to which the parties have stipulated in all three stipulations is thirty-four (34)

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| 1 | days from the date on which Defendant's response to the complaint was originally due. This is the last | | |
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| 2 | stipulation the parties will file respecting the deadline to respond to the complaint. | | |
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| 4 | Dated: April 17, 2015 | DHILLON LAW GROUP INC. | |
| 5 | | D / /H / W DI'H / 1 1 4/17/15) | |
| 6 | | By/s/ Harmeet K. Dhillon (as authorized on 4/17/15) Harmeet K. Dhillon | |
| 7 | | Attorneys for Plaintiff | |
| 8 | | | |
| 9 | Dated: April 17, 2015 | KEMPINSKY LAW LTD. | |
| 10 | | By/s/ Louis E. Kempinsky | |
| 11 | | Louis E. Kempinsky Attorneys for Defendant | |
| 12 | W 10 00 0 D D D D D | 1 Morneys 101 Detendant | |
| 13 | IT IS SO ORDERED. | | |
| 14 | Dated: April 23, 2015 | \sim | |
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| 17 | | Troy L. Nunley | |
| 18 | | United States District Judge | |
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Stipulation and Order To Further Extend Time To Respond To Complaint

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