

CHRISTENSEN EHRET LLP

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9 Attorneys for Defendant  
 10 MAY-HAN ELECTRIC dba M&M ELECTRIC  
 11 erroneously sued as M&M ELECTRIC

12 **UNITED STATES DISTRICT COURT**  
 13 **EASTERN DISTRICT OF CALIFORNIA**

14 KATIE M. STEFFEN, ) Case No.: 2:15-CV-01025-TLN-KJN  
 15 )  
 16 Plaintiff, )  
 17 )

18 vs. ) **STIPULATION AND ORDER TO**  
 19 ) **EXTEND TIME FOR DEFENDANT MAY**  
 20 ) **HAN ELECTRIC dba M&M ELECTRIC**  
 21 ) **TO RESPOND TO FIRST AMENDED**  
 22 ) **COMPLAINT**

23 UNION PACIFIC RAILROAD COMPANY, a )  
 24 Delaware Corporation, BRIAN L. KLINE, and )  
 25 DOES 1 through 10, inclusive, )  
 26 )  
 27 Defendants. )

28 ) *First Amended Complaint Filed:*  
 ) *January 6, 2017*

Pursuant to Local Rule 144 of the United States District Court, Eastern District, all parties hereby stipulate and request that the Court enter an order extending the time for Defendant MAY HAN ELECTRIC dba M&M ELECTRIC erroneously sued as M&M ELECTRIC (“Defendant”) to file an answer or other responsive pleading by approximately twenty (20) days.

1. On or about January 6, 2017, Plaintiff KATIE M. STEFFEN (“Plaintiff”) filed a First Amended Complaint, adding two Doe defendants including this Defendant.
2. An executed Summons indicates this Defendant was served on January 18, 2017.
3. Counsel for Defendant was retained only days before a responsive pleading was due and has not had an opportunity to review the file and prepare a responsive pleading.

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4. In order to allow Defendant sufficient time to prepare a responsive pleading, counsel for Defendant and the parties hereby agree to extend the time for Defendant to file an answer or other responsive pleading to **February 28, 2017**.

5. Therefore, the parties respectfully request that the Court so order.

This Stipulation can be executed in counterparts and copies of signatures will be treated as originals.

**IT IS SO STIPULATED.**

DATED: February 7, 2017 DREYER BABICH BUCCOLAR WOOD, et al.

By:         /s/    
HANK G. GREENBLATT, Esq.  
Attorneys for Plaintiff  
KATIE M. STEFFEN

DATED: February 7, 2017 CHRISTENSEN EHRET LLP

By:         /s/    
JENNIFER K. STINNETT, Esq.  
MARYSIA S. OKREGLAK, Esq.  
Attorneys for Defendant  
MAY HAN ELECTRIC dba M&M ELECTRIC  
erroneously sued as M&M ELECTRIC

DATED: February 7, 2017 UNION PACIFIC RAILROAD LAW DEPT.

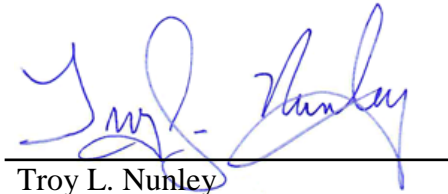
By:         /s/    
JOHN DANIEL FEENEY, Esq.  
Attorneys for Defendant  
UNION PACIFIC RAILROAD COMPANY

**ORDER**

Pursuant to the Stipulation of all parties and good cause shown, Defendant MAY HAN ELECTRIC dba M&M ELECTRIC erroneously sued as M&M ELECTRIC's deadline to respond to Plaintiff's First Amended Complaint is February 28, 2017.

**IT IS SO ORDERED.**

DATED: \_ February 8, 2017



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Troy L. Nunley  
United States District Judge

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