

CHRISTENSEN EHRET LLP

Jennifer K. Stinnett, Esq. (SBN 228209)
Marysia S. Okreglak, Esq. (SBN 1991348)
CHRISTENSEN EHRET LLP
2485 Natomas Park Drive, Suite 315
Sacramento, CA 95833
Tel.: (916) 443-6909 / Fax: (916) 313-0645
jstinnett@christensenlaw.com
mokreglak@christensenlaw.com

Attorneys for Defendant
TIM PAXIN’S PACIFIC EXCAVATION, INC.
erroneous sued as PACIFIC EXCAVATION, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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

vs.)

UNION PACIFIC RAILROAD COMPANY, a) **STIPULATION AND ORDER TO**
Delaware Corporation, BRIAN L. KLINE, and) **EXTEND TIME FOR DEFENDANT TIM**
DOES 1 through 10, inclusive,) **PAXIN’S PACIFIC EXCAVATION, INC.**
Defendants.) **erroneous sued as PACIFIC**
) **EXCAVATION, INC. TO RESPOND TO**
) **FIRST AMENDED COMPLAINT**

) *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 Defendant TIM PAXIN’S PACIFIC EXCAVATION, INC. erroneously sued as PACIFIC EXCAVATION, INC. (“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 Defendant.
2. An executed Summons indicates this Defendant was served on January 17, 2017.
3. Counsel for Defendant was retained only days before a responsive pleading was due and has not the opportunity to review the file and prepare a responsive pleading.

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 27, 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
TIM PAXIN'S PACIFIC EXCAVATION, INC.
erroneous sued as PACIFIC EXCAVATION, INC.

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

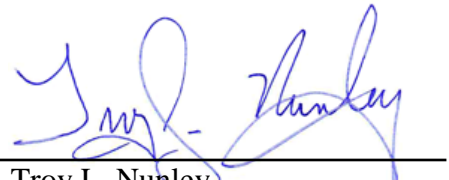
By: /s/
JOHN DANIEL FEENEY, Esq.
Attorneys for Defendant
UNION PACIFIC RAILROAD COMPANY

ORDER

Pursuant to the Stipulation of all parties and good cause shown, Defendant TIM PAXIN'S PACIFIC EXCAVATION, INC. erroneously sued as PACIFIC EXCAVATION, INC.'S deadline to respond to Plaintiff's First Amended Complaint is February 27, 2017.

IT IS SO ORDERED.

DATED: February 8, 2017


Troy L. Nunley
United States District Judge