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15 Attorneys for Defendant DEREK C. DECKER

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA

18		
19	SOURCIS, INC, a California corporation,) Case No.: 2:15-cv-01588-TLN-KJN
20	Plaintiff,)
21	v.) STIPULATION AND ORDER RE:
22) CONTINUANCE OF HEARING DATE ON
23	BRAVO DEVELOPMENT GROUP, INC., a) DEFENDANT BRAVO DEVELOPMENT
24	California corporation; et al.,) GROUP, INC.’S MOTION TO DISMISS
25	Defendants.) AND ANTI-SLAPP MOTION
26)
27) Complaint Filed: July 23, 2015
28) FAC Filed: September 18, 2015

Plaintiff SOURCIS, INC. ("Plaintiff"), Defendant Bravo Development Group, Inc.

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law corporation

1 (“Bravo”) and Defendant Derek C. Decker (“Decker”), by and through their counsel of
2 record, hereby submit the following Stipulation and [Proposed] Order re: Continuance of
3 Hearing Date on Defendant Bravo’s Motions:

4 1. WHEREAS, on October 12, 2015, Bravo filed its Motion to Dismiss (Dckt.
5 #15) and Motion to Strike Lawsuit Against Public Policy (“Anti-SLAPP Motion”) (Dckt. #14)
6 which were set for hearing on November 19, 2015;

7 2. WHEREAS, counsel for Plaintiff was in trial through October 27, 2015 and
8 has requested that the hearing date be continued to allow Plaintiff additional time to
9 prepare its oppositions to the motions;

10 3. WHEREAS, Bravo is agreeable to continuing the hearing on its Motion to
11 Dismiss and Anti-SLAPP Motion to December 10, 2015;

12 4. WHEREAS, given the intervening Thanksgiving holidays, the parties agree to
13 modify the briefing schedule as follows:

14 a. Plaintiff’s Oppositions to the Motion to Dismiss and Anti-SLAPP
15 Motion shall be filed on or before November 20, 2015;

16 b. Any reply briefs by Bravo shall be filed on or before December 2,
17 2015.

18 5. WHEREAS, the parties agree that discovery commenced after the joint
19 F.R.C.P. Rule 26(f) conference currently as held on October 28, 2015.

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21 THEREFORE, the parties hereto stipulate and request the Court to issue an Order that:

22 1. The hearing on Bravo’s Motion to Dismiss and Anti-SLAPP Motion be
23 continued to December 10, 2015;

24 2. Any oppositions to such motions be filed on or before November 20, 2015;

25 3. Any reply briefs in support of said motions be filed on or before December
26 2, 2015; and

27 4. Discovery commenced after the parties’ joint F.R.C.P. Rule 26(f) conference
28 on October 28, 2015.

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IT IS SO STIPULATED.

Dated: November 3, 2015

BURGOYNE LAW GROUP

By: /s/ - Henry M. Burgoyne, III
Henry M. Burgoyne, III
Attorneys for Plaintiff Sourcis, Inc.

Dated: November 3, 2015

WEINTRAUB TOBIN CHEDIAK COLEMAN GRODIN
Law Corporation

By: /s/ - James Kachmar
James Kachmar

Attorneys for Defendant Bravo Development
Group, Inc.

Dated: November 3, 2015

BOUTIN JONES INC.

By: /s/ - Michael E. Chase
Robert D. Swanson
Michael E. Chase

Attorneys for Defendant Derek C. Decker

IT IS SO ORDERED.

Dated: November 3, 2015



Troy L. Nunley
United States District Judge