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7 Elite Continuing Education, Inc.

8   **UNITED STATES DISTRICT COURT**

9   **EASTERN DISTRICT OF CALIFORNIA**

10   **SACRAMENTO DIVISION**

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   CE RESOURCE, INC. d/b/a NetCE,   )
14   ) Case No.: 2:15-cv-01908-WBS-DAD
                    Plaintiff,   )
15   )
16   ) STIPULATED REQUEST FOR
                    vs.   ) EXTENSION OF TIME
17   ) TO RESPOND TO COMPLAINT
) (SECOND REQUEST)
18 DR. JASSIN JOURIA, an individual, and   )
   ELITE CONTINUING EDUCATION, INC., a   )
19 Florida Corporation.   )
)
20   Defendant.   )
)
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SECOND STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

On October 7, 2015, the parties filed a stipulation pursuant to Eastern District Local Rule 144(a) stating that Defendant Elite Continuing Education, Inc. ("Elite") may have up to and including November 5, 2015 to file an answer or otherwise respond to the complaint. That was the first extension of time in this case and extended the time to file by twenty-eight days.

The parties now seek the Court's approval to stipulate that Elite may have up to and including November 25, 2015, to file an answer or otherwise respond to the complaint. This is the second extension of time sought in this case.

Elite seeks this extension in part because the other named Defendant in this matter, Dr. Jassin Jouria, filed a Chapter 13 action in the United States Bankruptcy Court for the Southern District of Florida on October 23, 2015 (Case No. 15-28811-LMI). The complexities injected into the case by Dr. Jouria's recent bankruptcy filing are still under review. Additionally, the undersigned counsel for Elite is traveling the remainder of this week for a court hearing in Arizona, and the requested extension of time is greatly appreciated.

For these reasons, Defendant Elite requests that the Court grant the requested extension of time to respond to Plaintiff's complaint. Plaintiff has stipulated to this extension request.

SECOND STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

1   Dated: November 4, 2015   Respectfully submitted,

2   /s/ Kathryn G. Cole

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                                        d/b/a/ NetCE

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20 In accordance with the foregoing stipulation IT IS SO ORDERED.

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22 Dated: November 4, 2015

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24 WILLIAM B. SHUBB
    UNITED STATES DISTRICT JUDGE

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SECOND STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT