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Attorneys for DEFENDANTS:
SIERRA JOINT COMMUNITY COLLEGE DISTRICT; SIERRA COLLEGE; BEN NOONAN;
LUCAS MOOSMAN; and ROZ GOLDENBERG

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

NEBRASKA HUGGINS,

Plaintiff,

v.

SIERRA JOINT COMMUNITY COLLEGE
DISTRICT; SIERRA COLLEGE; BEN
NOONAN; LUCAS MOOSMAN, ROZ
GOLDENBERG, and DOES 1-10, inclusive,

Defendants.

CASE NO. 2:15-cv-02098-WBS-CKD

**STIPULATION AND ORDER FOR
EXTENSION TO DEFENDANTS TO FILE
RESPONSIVE PLEADING UNTIL
PLAINTIFF FILES AN AMENDED
COMPLAINT**

Complaint Filed: October 7, 2015

Trial Date: None Set

Pursuant to Local Rule 144(a), the parties agree and stipulate that Defendants should be granted additional time to file a responsive pleading for the following reasons:

- Following a meet and confer process between counsel, Plaintiff has agreed to file an amended complaint to address various issues raised by defense counsel;
- Defendants' responsive pleading is due on January 29, 2016 if a further extension is not granted by the Court;
- Plaintiff intends to file the amended complaint by Friday, January 29, 2016;
- As this is the last day for Defendants to respond to the Complaint, Defendants would not have sufficient time to prepare a responsive pleading should, for whatever reason, Plaintiff be unable to file the amended complaint by January 29, 2016;
- In order to avoid any possible waivers or negative consequences, Defendants should be granted an extension while Plaintiff prepares and files the amended complaint.

The parties therefore agree and stipulate that Defendants should be granted an additional extension to file a response to Plaintiff's Complaint, and further agree that Defendants' rights to raise any objections and motions under Rule 12 as to the First Amended Complaint are preserved.

The parties request an order from the Court that Defendants' time to file a response to Plaintiff's Complaint be extended for two additional weeks, to Friday, February 12, 2016.

Dated: January 22, 2016

JOHNSON SCHACHTER & LEWIS
A Professional Law Corporation

/s/ Alesa Schachter
ALESA SCHACHTER

Attorneys for DEFENDANTS
LAW OFFICE OF STEWART KATZ

Dated: January 22, 2016

/s/ Stewart Katz (as authorized on 1/22/16)
STEWART KATZ
Attorneys for PLAINTIFF

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 25, 2016



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE