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14 Attorneys for: Plaintiff

15 **UNITED STATES DISTRICT COURT**  
 16 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

17 MARY E. TYE, on behalf of herself and all  
 18 others similarly situated,

19 Plaintiff,

20 vs.

21 GLOBAL TRAVEL INTERNATIONAL,  
 22 INC., a Florida corporation; DOES I  
 23 through X, inclusive; and ROE  
 24 CORPORATIONS I through X, inclusive,

25 Defendant(s)

Case No. 2:15-cv-02654-KJM-AC

**STIPULATION TO EXTEND  
 TIME TO RESPOND TO  
 COMPLAINT**

Complaint Filed: December 23, 2015

Hon. Kimberly J. Mueller

1 Plaintiff Mary E. Tye, on behalf of herself and all other similarly situated  
2 (“Plaintiff” or “Tye”) and Defendant Global Travel International, Inc. (“Defendant” or “GTI”)  
3 (collectively the “Parties”), by and through their respective counsel, stipulate and agree as  
4 follows:

5 **RECITALS**

6 WHEREAS, Plaintiff filed the Complaint against Defendant on or about  
7 December 23, 2015;

8 WHEREAS, Plaintiff was unable to serve Defendant until February 1, 2016;

9 WHEREAS, the Parties previously requested one extension of time to respond  
10 to the Complaint to conduct preliminary discovery regarding ownership of the telephone  
11 number Plaintiff has alleged called her;

12 WHEREAS, the Parties request was construed as an Ex Parte request because  
13 Defendant’s Counsel was not yet admitted to this Court *pro hac vice*;

14 WHEREAS, Defendant Counsel has now been admitted to this Court *pro hac*  
15 *vice*;

16 WHEREAS, the Parties have been diligently working together to subpoena  
17 phone records to determine the source of the alleged illegal call and the proper parties to this  
18 action;

19 WHEREAS, the Parties have issued three separate subpoenas after learning that  
20 each company subpoenaed was not the source of the alleged illegal call or property party to  
21 this action;

22 WHEREAS, the Parties agree that a short continuance of (30) days should be  
23 sufficient to resolve the issue;

24 WHEREAS, the Parties agree that the new deadline for Defendant to file a  
25 response to the Complaint shall be Monday June 1, 2016;

26 WHEREAS, the Parties agree that the Status Conference should be continued to  
27 Thursday, July 7, 2016, or as the Court otherwise orders;

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**STIPULATION**

1. Plaintiff consents to an additional extension of time of thirty (30) days for Defendant to file a response to the Complaint.

2. The Parties agree that the new deadline for Defendant to file a response to the Complaint shall be June 1, 2016.

3. The Parties agree that the Status Conference should be continued to July 7, 2016, at 2:30 p.m.

**IT IS SO STIPULATED**

Dated: April 18, 2016

MARQUIS AURBACH COFFING

By  /s/ Candice E. Renka

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Attorneys for Plaintiff

Dated: April 18, 2016

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By  /s/ Michele Shuster

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Attorneys for Defendant

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**ORDER APPROVING STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND TO CONTINUE STATUS CONFERENCE**

The Court has reviewed and considered the Second Stipulation to Extend Time to Respond to the Complaint and to Continue the Status Conference entered into by and between Plaintiff Mary E. Tye, on behalf of herself and all other similarly situated (“Plaintiff” or “Tye”) and Defendant Global Travel International, Inc. (“Defendant” or “GTI”).

The Court being informed, and after full consideration of the Stipulation, concludes that the extensions agreed to therein shall be approved.

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** as follows:

- 1. The Stipulation to Extend Time to Respond to the Complaint and to Continue the Status Conference is GRANTED;
- 2. The new deadline for Defendant to file a response to the Complaint is June 1, 2016;
- 3. The Status Conference previously set for May 26, 2016, at 2:30 p.m. is continued to Thursday, July 7, 2016 at 2:30 p.m. with the filing of a Joint Status Report due seven days prior.

Dated: April 26, 2016.

  
UNITED STATES DISTRICT JUDGE