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Attorneys for ALLIANCE REDWOODS
CONFERENCE GROUNDS (sued as Alliance
Redwoods Outdoor Recreation)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

J.M., a minor, by and through her Guardian ad
litem, NANCY MORIN-TEAL and NANCY
MORIN-TEAL, an individual,

Plaintiff,

vs.

PLEASANT RIDGE UNION SCHOOL
DISTRICT, MAGNOLIA INTERMEDIATE
SCHOOL, ALLIANCE REDWOODS
OUTDOOR RECREATION, COUNTY OF
NEVADA and DOES 1 to 50,

Defendants.

CASE NO. 2:2016-cv-00897-WBS-CKD

**JOINT STIPULATION REQUESTING
ORDER TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT PURSUANT TO
LOCAL RULE 144(a)**

Plaintiffs J.M., a minor, by and through her Guardian ad Litem Nancy Morin-Teal, and Nancy Morin-Teal (“Plaintiffs”), and Defendant Alliance Redwoods Conference Grounds (sued as Alliance Redwoods Outdoor Recreation (“Defendant”), by and through their respective attorneys of record, stipulate as follows:

1. On April 29, 2016, Plaintiffs filed a Complaint against Defendants Alliance Redwoods Conference Grounds, Pleasant Ridge Union School District, Magnolia Intermediate School, the County of Nevada, and Does 1 to 50.

2. Plaintiffs served the Complaint on Defendant Alliance Redwoods Conference Grounds on

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August 30, 2016.

3. On September 23, 2016, Plaintiffs and Defendant Alliance Redwoods Conference Grounds stipulated that Defendant’s deadline to answer or otherwise respond to Plaintiffs’ Complaint would be October 14, 2016.
4. On October 3, 2016, the Court heard oral arguments on Defendant Pleasant Ridge Union School District’s motion to dismiss. The Court took the motion under submission.
5. On October 4, 2016, counsel for Defendant Alliance Redwoods Conference Grounds met and conferred with Plaintiffs’ counsel regarding Defendant’s intent to file a motion to dismiss. Plaintiffs’ counsel stated he is amenable to amending the Complaint to address the deficiencies noted by defense counsel for Alliance Redwoods Conference Grounds.
6. In the interest of efficiency, Plaintiffs’ Counsel and counsel for Alliance Redwoods Conference Grounds seek an order extending Defendant’s time to respond to the Complaint to November 1, 2016.
7. This extension will allow Plaintiffs’ counsel to file a single amended Complaint which addresses the deficiencies raised by counsel for Alliance Redwoods Conference Grounds as well as any deficiencies found by the Court in its forthcoming Order on Pleasant Ridge Union School District’s motion to dismiss.
8. This change will not alter the date of any deadlines already fixed by Court order.
9. This change will not affect the other parties who have appeared in this action.

1 DATED: October 6, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By: /s/ China Westfall

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Joseph R. Lordan

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China M. Westfall

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Attorneys for Defendant Alliance Redwoods

Conference Grounds (sued as Alliance Redwoods

Outdoor Recreation)

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9 DATED: October 6, 2016

AMERIO LAW FIRM., P.C.

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By: /s/ Jeffrey Fletterick

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Jeffrey Fletterick

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Attorneys for Plaintiffs

J.M., a minor, by and through her Guardian and

Litem Nancy Morin-Teal, and Nancy Morin-Teal

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SIGNATURE ATTESTATION

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I hereby attest that all signatories listed above, on whose behalf this Stipulation is submitted, concur in the filing’s content and have authorized this filing.

DATED: October 6, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ China Westfall
Joseph R. Lordan
China Westfall
Attorneys for Defendant Alliance Redwoods
Conference Grounds (sued as Alliance Redwoods
Outdoor Recreation)

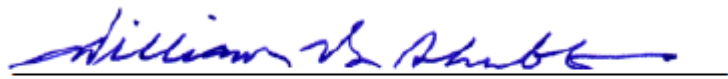
[PROPOSED] ORDER

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The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that Defendant Alliance Redwoods Conference Grounds' time to respond to the Complaint is extended to November 1, 2016.

Dated: October 7, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

J.M. v. Pleasant Ridge Union School District, et al.
USDC– Eastern, Sac Div, Case No.: 2:2016-cv-00897-WBS-CKD

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to the action. My business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On October 6, 2016, I served the following document(s):

JOINT STIPULATION FOR EXTENTION OF TIME TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT PURSUANT TO LOCAL RULE 144(a)

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

SEE ATTACHED SERVICE LIST

The documents were served by the following means:

(BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on October 6, 2016, at San Francisco, California.

/s/ Sharice Valenzuela
SHARICE VALENZUELA

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SERVICE LIST
J.M. v. Pleasant Ridge Union School District, et al.
USDC– Eastern, Sac Div, Case No.: 2:2016-cv-00897-WBS-CKD

<p>Ashley R. Amerio, Esq. Jeffrey Fletterick, Esq. AMERIO LAW FIRM, P.C. 1651 Response Road, Suite 111 Sacramento, CA 95815 Tel: 916.419.1111 Fax: 916.649.1747 Email: Ashley@ameriolaw.com jeff@ameriolaw.com</p> <p><i>Attorneys for Plaintiff</i> J.M. and her Guardian ad Litem, NANCY MORIN</p>	<p>Cori Rae Sarno, Esq. Kristin Alisan Blocher, Esq. ANGELO, KILDAY & KILDUFF, LLP 601 University Avenue, Suite 150 Sacramento, CA 95825 Tel: 916.564.6100 x229 Fax: 916.564.6263 Email: csarno@akk-law.com</p> <p><i>Attorney for Defendant</i> PLEASANT RIDGE UNION SCHOOL DISTRICT</p>
<p>Kristin Alisan Blocher LAW OFFICES OF KRISTIN A. BLOCHER P.O. Box 491 Sacramento, CA 95812 Tel: 916.945.2720 Fax: 916.945.2720 Email: blocher.esq@gmail.com</p> <p><i>Attorney for Defendant</i> PLEASANT RIDGE UNION SCHOOL DISTRICT</p>	<p>Amanda Uhrhammer County Of Nevada 950 Maidu Avenue Nevada City, CA 95959 Tel: 530-265-1510 Email: amanda.uhrhammer@co.nevada.ca.us</p> <p><i>Attorney for Defendant</i> COUNTY OF NEVADA</p>