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Attorneys for Plaintiff/Counter-Defendants  
JOLI GRACE, LLC; STACIE LANCASTER;  
ARTHUR LANCASTER; and LOVE GRACE  
HOLDINGS, INC.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JOLI GRACE, LLC, a Louisiana Limited  
Liability Company,

Plaintiff,

v.

COUNTRY VISIONS, INC., a California  
corporation,

Defendant.

Case No. 2:16-cv-01138-WBS-EFB

**JOINT STIPULATION TO CONTINUE  
HEARING ON MOTION TO DISMISS  
COUNTERCLAIM; [PROPOSED] ORDER**

AND RELATED CROSS-ACTIONS.

Plaintiff/Counter-Defendants JOLI GRACE, LLC; STACIE LANCASTER; ARTHUR  
LANCASTER; and LOVE GRACE HOLDINGS, INC., and Defendant/Counter-Claimant  
COUNTRY VISIONS, INC. (the “Parties”), by and through their respective counsel of record,  
stipulate as follows:

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**RECITALS**

On October 17, 2016, Plaintiff/Counter-Defendants JOLI GRACE, LLC, STACIE LANCASTER, LOVE GRACE HOLDINGS, INC. AND ARTHUR LANCASTER (Counter-Defendants) filed a motion to dismiss counterclaim. The motion is currently set for hearing on October 31, 2016.

Counsel for Plaintiff/Counter-Defendants has a scheduling conflict with the current hearing date. Defendant/Counter-Claimant is willing to continue the date of the hearing to accommodate this scheduling conflict so long as the briefing schedule for the Motion remains based on the initial hearing date, and Counter Defendants do not seek to change the November 14, 2016 hearing date on Defendant's Motion for a Preliminary Injunction.

**STIPULATION**

The Parties stipulate to vacate the hearing date of October 31, 2016, and continue the motion hearing to November 28, 2016. The deadline to file any reply papers shall not move and shall be based on the original hearing date, and Counter-Defendants will not seek to change the hearing date on Defendant's Motion for a Preliminary Injunction.

DATED: October 24, 2016

DOWNEY BRAND LLP

By: /s/ Elizabeth B. Stallard  
ELIZABETH B. STALLARD  
Attorneys for Plaintiff/Counter-Defendants  
JOLI GRACE, LLC; STACIE LANCASTER,  
ARTHUR LANCASTER; and LOVE GRACE  
HOLDINGS, INC.

DATED: October 24, 2016

DLA PIPER LLP

By: /s/ Robert D. Swanson (as authorized on 10/24/16)  
ROBERT D. SWANSON  
Attorneys for Defendants/Counter-Claimant  
COUNTRY VISIONS, INC.

**ORDER**

Based on the Parties' stipulation, and good cause appearing therefore, IT IS HEREBY ORDERED that the hearing date on the pending motion to dismiss be vacated and continued to November 28, 2016, at 1:30 p.m. in Courtroom 5, 14th Floor. The deadline to file any reply shall not move and shall be based on the original hearing date.

IT IS SO ORDERED.

Dated: October 24, 2016



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE