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Television Education, Inc.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

TELEVISION EDUCATION, INC. Plaintiff, vs. CONTRACTORS INTELLIGENCE SCHOOL, INC.; CONTRACTORS PUBLISHER, INC.; and DOES 1-25, Defendants.	**Case No. 2:16-cv-01433-WBS-EFB** **STIPULATION AND [~~PROPOSED~~] ORDER PERMITTING PLAINTIFF TELEVISION EDUCATION, INC. TO FILE A FIRST AMENDED COMPLAINT; AND NOTICE OF WITHDRAWAL OF MOTION TO STRIKE AFFIRMATIVE DEFENSES** **Trial Date:** **Not yet set** **Date Action Filed:** **June 23, 2016**

Plaintiff Television Education, Inc. ("Television Education") and Defendants Contractors Intelligence School, Inc. and Contractors Publisher, Inc. ("Defendants"), by and through their undersigned counsel of record, hereby stipulate as follows and propose that the Court enter an order consistent with the terms present.

RECITALS

WHEREAS, on June 23, 2016, Television Education filed its Complaint for Copyright Infringement and Demand for Jury Trial ("Complaint") against Defendants.

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STIPULATION AND [PROPOSED] ORDER PERMITTING PLAINTIFF TELEVISION EDUCATION, INC. TO FILE A FIRST AMENDED COMPLAINT; AND NOTICE OF WITHDRAWAL OF MOTION TO STRIKE AFFIRMATIVE DEFENSES

1 **WHEREAS,** on July 18, 2016, Defendants filed their Answer to the Complaint.

2 **WHEREAS**, on August 8, 2016, Television Education filed its Motion to Strike

3 Defendants' Affirmative Defenses Nos. 4, 5, 6, 7, 11, 12, 20, 24 and 25 ("Motion to Strike"). The

4 Motion to Strike was noticed for September 6, 2016.

5 **WHEREAS**, on August 19, 2016, Television Education renoticed the Motion to Strike to

6 October 17, 2016.

7 **WHEREAS**, to minimize litigation costs and to serve the interests of justice, counsel for

8 Television Education and Defendants have agreed to permit Television Education to file its First

9 Amended Complaint for Copyright Infringement and Demand for Jury Trial ("First Amended

10 Complaint").

11 **NOW, THEREFORE**, Television Education and Defendants stipulate that the Court may

12 enter an Order granting Television Education leave to file the First Amended Complaint, a true and

13 correct copy of which is attached hereto as **Exhibit A**.

14 It is further stipulated and understood that Television Education's Motion to Strike is

15 withdrawn, without prejudice.

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17 **SO STIPULATED**

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19 DATED: September 19, 2016 **BOUTIN JONES INC.**

20 By: /s/*BASHAR AHMAD*

21 MICHAEL E. CHASE
BASHAR AHMAD

22 Attorneys for Plaintiff Television Education, Inc.

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STIPULATION AND [PROPOSED] ORDER PERMITTING PLAINTIFF TELEVISION EDUCATION, INC. TO
28 FILE A FIRST AMENDED COMPLAINT; AND NOTICE OF WITHDRAWAL OF MOTION TO STRIKE
AFFIRMATIVE DEFENSES

1 DATED: September 19, 2016   **TINGLEY LAW GROUP, PC**

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3 By: /s/ *KEVIN W. ISAACSON (W/ PERMISSION)*
               KEVIN W. ISAACSON

4 Attorneys Defendants Contractors Intelligence
School, Inc. and Contractors Publisher, Inc.

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7 **ORDER**

8   **IT IS ORDERED** that Plaintiff Television Education, Inc. ("Television Education") has

9 leave to file the First Amended Complaint for Copyright Infringement and Demand for Jury Trial

10 ("First Amended Complaint"). Plaintiff shall file the First Amended Complaint within twenty (20)

11 days of entry of this Order

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13   **IT IS SO ORDERED**

14 Dated: September 20, 2016

15 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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STIPULATION AND [PROPOSED] ORDER PERMITTING PLAINTIFF TELEVISION EDUCATION, INC. TO
FILE A FIRST AMENDED COMPLAINT; AND NOTICE OF WITHDRAWAL OF MOTION TO STRIKE
AFFIRMATIVE DEFENSES