1	SEYFARTH SHAW LLP Kristina M. Launey (SBN 221335)		
2	klauney@seyfarth.com 400 Capitol Mall, Suite 2350		
3	Sacramento, California 95814 Telephone: (916) 448-0159		
4	Facsimile: (916) 558-4839		
5	SEYFARTH SHAW LLP Myra B. Villamor (SBN 232912)		
6	mvillamor@seyfarth.com 2029 Century Park East, Suite 3500		
7	Los Angeles, California 90071 Telephone: (310) 277-7200		
8	Facsimile: (310) 201-521		
9	Attorneys for Defendant WINCO FOODS, LLC		
10	UNITED STATES I	DISTRICT COURT	
11	EASTERN DISTRICT OF CALIFORNIA		
12	ROBERT KALANI,	Case No. 2:16-CV-01931 WBS (ACx)	
13	Plaintiff,	STIPULATION AND [PROPOSED]	
14	v.	ORDER EXTENDING DEFENDANT'S DEADLINE TO RESPOND TO	
15	WINCO FOODS, LLC, a Delaware limited	PLAINTIFF'S COMPLAINT,	
16	liability company, dba WINCO FOODS #103,	[L.R. 144(A)]	
17	Defendant.		
18			
19	Pursuant to the provisions of Local Rule 1	44(a), Plaintiff Robert Kalani ("Plaintiff") and	
20	Defendant WinCo Foods, LLC ("Defendant"), by and through their respective counsel, hereby stipulate that WinCo may have a 14-day extension of time in which to respond to Plaintiff's Complaint. Pursuant to this extension, a response by Defendant shall be due on or before November 9, 2016. This stipulation will not affect or alter any deadline previously set by Court order.		
21			
22			
23			
24			
25	///		
26	///		
27	///		
28			

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

35583524v.1

1	The reason for the present extension is that the parties are in the midst of finalizing the		
2	resolution of this matter.		
3			
4	Pursuant to Local Rule 131(e), counsel for Plaintiff has authorized submission of this		
5	document on her behalf.		
6	DATED: October 26, 2016 SEYFARTH SHAW LLP		
7			
8	By/s/ Myra B. Villamor		
9	Myra B. Villamor Attorneys for Defendant		
10	WinCo Foods, LLC		
11	DATED: October 26, 2016 MOORE LAW FIRM, P.C.		
12			
13	By /s/ Tanya E. Moore Tanya E. Moore		
14	Attorneys for Plaintiff Robert Kalani		
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26 27			
20	_2_		
28	-2-		

1		ORDER
2		
3	Based on the foregoing stipulation, IT IS SO ORDERED that the following deadline applies:	
4	November 0, 2016	andling for Defendant to Despend to Complaint
5		eadline for Defendant to Respond to Complaint
6		
7	Dated: November 3, 2016	
8		william of shape
9		ILLIAM B. SHUBB NITED STATES DISTRICT JUDGE
10		MILD STATES DISTRICT FODGE
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
2627		
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$		