1 2 3 4 5 6	MICHAEL HOFFMAN, Bar No. 162496 CONOR D. MACK, Bar No. 253878 ARENA HOFFMAN LLP 44 Montgomery Street, Suite 3520 San Francisco, CA 94104-4828 Telephone: 415.433.1414 Facsimile: 415.520.0446 Email: mhoffman@arenahoffman.com Attorneys for Defendants AUTOZONERS, LLC and ALLDATA, LLC	
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8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA	
10		
11	LADY CHRISTIAN HAVENS,	Case No. 2:16-cv-02503-KJM-GGH
12	Plaintiff,	STIPULATION AND [PROPOSED]
13	V.	ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT BY NOT MORE THAN
14	AUTOZONERS, LLC; ALLDATA, LLC; and DOES 1 through 50, inclusive,	30 DAYS; AND [PROPOSED] ORDER THEREON (L.R. 8-3)
15	Defendants.	
16	Defendants.	2nd Am. Compl. served: June 27, 2017 Responsive pleading due: July 11, 2017
17		New response deadline: July 14, 2017
18		
19	IT IS HEREBY STIPULATED, by and between all parties to the action, to the following:	
20	Defendants' responsive pleading to the operative Second Amended Complaint is currently	
21	due on July 11, 2017.	
22	Pursuant to the Court's Standing Order, defense counsel and Plaintiff's counsel met and	
23	conferred regarding Defendants' anticipated motion to dismiss the fifth cause of action for	
24	defamation in the Second Amended Complaint. In addition to exchanging correspondence,	
25	Plaintiff's counsel and defense counsel conferred by phone regarding a potential motion on July 10.	
26	Plaintiff and Defendants seek a few more days to deliberate on the remaining issues to be presented	
27	in the motion and possibly resolve the dispute.	
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IAN LLP		

Case No. 2:16-cv-02503-KJM-GGH

1	Accordingly, pursuant to Local Rule 144(a), Plaintiff and Defendants stipulate to extend the	
2	time for Defendants to respond to the Second Amended Complaint until July 14, 2017. Good cause	
3		
4	exists to extend the time for Defendants to respond to the Second Amended Complaint so that the	
5	parties may try to avoid a motion to dismiss, or narrow the issues raised in a motion to dismiss.	
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7	Dated: July 11, 2017	
	/s/ Erik M. Roper	
8	Erik M. Roper Law Office of Erik M. Roper	
9	Counsel for Plaintiff	
10	LADY CHRISTIAN HAVENS	
11		
12	Dated: July 11, 2017	
13	/s/ Michael Hoffman Michael Hoffman	
14	Arena Hoffman LLP	
	Counsel for Defendants AUTOZONERS, LLC and ALLDATA, LLC	
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16		
17	ORDER	
18	Durguent to stimulation and good equal arreaging the deadline for Defer lasts to file	
19	Pursuant to stipulation and good cause appearing, the deadline for Defendants to file a	
20	responsive pleading to the Second Amended Complaint shall be extended to July 14, 2017.	
21	IT IS SO ORDERED.	
22	DATED: July 14, 2017.	
23	DATED. July 14, 2017.	
24	A Mind of	
25	UNITED STATES DISTRICT JUDGE	
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ARENA HOFFMAN LLP 44 Montgomery Street Suite 3520 San Francisco, CA 94104 415.433.1414	STIPULATION RE RESP. TO COMPLAINT 2. Case No. 2:16-cv-02503-KJM-GGH	