

1 LITTLER MENDELSON, P.C.
 BENJAMIN L. WEBSTER, Bar No. 132230
 2 bwebster@littler.com
 JOHNNY A. COLÓN, Bar No. 294447
 3 jcolon@littler.com
 500 Capitol Mall, Suite 2000
 4 Sacramento, CA 95814
 Telephone: 916.830.7200
 5 Facsimile: 916.561.0828

6 Attorneys for Defendant
 THE UNIVERSITY OF PHOENIX, INC.

7 VAUGHAN & ASSOCIATES
 8 CRIS C. VAUGHAN, Bar No. 99568
ccvaughan@sbcglobal.net
 9 6207 South Walnut Street, Suite 800
 Loomis, CA 95650
 10 Telephone: 916.660.9401
 Facsimile: 916660.9378

11 Attorney for Plaintiff
 12 JACK C. KELLUM

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA

16 JACK C. KELLUM,

17 Plaintiff,

18 v.

19 THE UNIVERSITY OF PHOENIX, INC.;
 20 and DOES 1-50, inclusive,

21 Defendant.

Case No. 2:16-cv-02678-JAM-KJN

**STIPULATION AND ORDER GRANTING
 EXTENSION OF TIME FOR DEFENDANT
 TO RESPOND TO PLAINTIFF'S
 COMPLAINT AND TO SUBMIT JOINT
 STATUS REPORT (LOCAL RULE 144(a))**

Current Response Date: February 15, 2017
 New Response Date: March 17, 2017

1 Pursuant to Eastern District Local Rule 144(a), Plaintiff Jack C. Kellum (“Plaintiff”)
2 and Defendant the University of Phoenix, Inc. (“UOP”) (collectively the “Parties”) hereby stipulate
3 and request a thirty (30) day extension of time for UOP to answer or otherwise respond to Plaintiff’s
4 Complaint. The Parties also request the same extension of time for the parties to submit their Joint
5 Status Report. This is the Parties’ second request for an extension of time from this Court.

6 Good cause exists as the Parties are continuing to engage in good faith discussions
7 regarding the terms and conditions of a proposed settlement agreement. Since the last extension of
8 time, the Parties have made significant progress regarding the proposed settlement agreement (*e.g.*,
9 they have reached an agreement in principle for Plaintiff to re-take a set number of classes at UOP
10 free of charge). The Parties, however, need an additional extension to resolve additional terms and
11 conditions regarding Plaintiff’s return to UOP, *e.g.*, grade point average needed to confer his Master
12 in Business Administration and additional accommodations. The Parties respectfully request this
13 Court to grant an additional extension to allow the Parties to continue and conclude their productive
14 settlement discussions.

15 **IT IS SO STIPULATED.**

16 Dated: February 13, 2017

VAUGHAN & ASSOCIATES

17
18
19 /s/ Cris A. Vaughan
20 CRIS A. VAUGHAN
21 ATTORNEYS FOR PLAINTIFF
22 JACK C. KELLUM

23 Dated: February 13, 2017

LITTLER MENDELSON, P.C.

24 /s/ Johnny A. Colón
25 BENJAMIN L. WEBSTER
26 JOHNNY A. COLÓN
27 ATTORNEYS FOR DEFENDANT
28 THE UNIVERSITY OF PHOENIX, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

For good cause, the Parties' request for a thirty (30) day extension of the filing deadline for Defendant's response to Plaintiff's Complaint and the filing deadline for the Joint Status Report, IS HEREBY GRANTED. Defendant's response to the Complaint shall be due on March 17, 2017. The Joint Status Report shall be due on April 1, 2017.

IT IS SO ORDERED.

Dated: 2/13/2017

/s/ John A. Mendez
JUDGE JOHN A. MENDEZ