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14 **MEDICAL DATA SYSTEMS, INC., dba**
MEDICAL DATA REVENUE SYSTEM

15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17
18 JONATHAN LIZAMA,
19 Plaintiff,

20 vs.

21 **MEDICAL DATA SYSTEMS, INC.,**
22 **dba MEDICAL DATA REVENUE**
SYSTEM; DOES 1-100 AND EACH
OF THEM,

23 Defendants.
24

Case No. 2:16-cv-02773-WBS-CKD

**SECOND STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Complaint Served: December 14, 2016
Current Response Due: January 26, 2017
New Response Deadline: February 9, 2017

25 IT IS HEREBY STIPULATED between Plaintiff JONATHAN LIZAMA
26 (“Plaintiffs”) and Defendants MEDICAL DATA SYSTEMS, INC. dba MEDICAL
27 DATA REVENUE SYSTEM (“Defendant”), through their respective counsel, as
28 follows:

1 WHEREAS, Plaintiff served the Complaint on December 14, 2016;

2 WHEREAS, a Stipulation to Extend Time to Answer was filed on December 29,
3 2016, extending the deadline for Defendant to respond to January 26, 2017 [Docket No.
4 5];

5 WHEREAS, Defendant, due to the press of business, needs additional time to
6 review documents to assist in an early resolution of the entire matter;

7 WHEREAS, Plaintiff and Defendant (hereinafter referred to as "Parties") have met
8 and conferred and agree good cause exists to extend the deadline for Defendant to
9 respond to Plaintiff's Complaint to February 9, 2017;

10 WHEREAS, no party claims prejudice as a result of the extension of time;

11 WHEREFORE, the Parties stipulate and agree that Defendant shall have an
12 extension of time up to and including February 9, 2017 within which to respond to
13 Plaintiff's Complaint.
14

15 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

16 Dated: January 25, 2017

By: /s/ Adrian R. Bacon

17 Adrian R. Bacon
18 Attorney for Plaintiff
JONATHAN LIZAMA

19 **CARLSON & MESSER, LLP**

20 Dated: January 25, 2017

By: /s/ Shawn Eldridge

21 Shawn Eldridge
22 Attorney for Defendant
23 MEDICAL DATA SYSTEMS, INC., dba
MEDICAL DATA REVENUE SYSTEM

24 **IT IS SO ORDERED.**

25 Dated: January 26, 2017



26 **WILLIAM B. SHUBB**
27 **UNITED STATES DISTRICT JUDGE**
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3 **ATTESTATION AND CERTIFICATE OF SERVICE**

4 I, Shawn S. Eldridge, am the ECF user whose identification and password are
5 being used to file the SECOND STIPULATION TO EXTEND TIME TO RESPOND TO
6 COMPLAINT, I hereby attest that all counsel whose electronic signatures in the
7 SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT
8 provided their authority and concurrence to file that document.

9
10 **CARLSON & MESSER LLP**

11 Dated: January 25, 2017

12 By: /s Shawn Eldridge
13 Shawn Eldridge
14 Attorney for Defendant,
15 MEDICAL DATA SYSTEMS, INC., dba
16 MEDICAL DATA REVENUE SYSTEM

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2017, a true and correct copy of the foregoing
SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT was
served via the District Court ECF on the Following:

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CARLSON & MESSER, LLP

Dated: January 25, 2017

By: /s/ Shawn Eldridge

David J. Kaminski
Shawn Eldridge
Attorneys for Defendant
MEDICAL DATA SYSTEMS, INC., dba
MEDICAL DATA REVENUE SYSTEM