

1 JEFFREY M. VUCINICH, ESQ. BAR#: 67906

jvucinich@clappmoroney.com

2 ELIZABETH D. RHODES, ESQ. BAR#: 218480

erhodes@clappmoroney.com

3 CLAPP, MORONEY, VUCINICH, BEEMAN and SCHELEY

4 A PROFESSIONAL CORPORATION

5 1111 Bayhill Drive, Suite 300

San Bruno, CA 94066

6 (650) 989-5400 (650) 989-5499 FAX

7 Attorneys for Defendant

8 BATH & BODY WORKS, LLC

9 UNITED STATE DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

12 CRYSTAL LAKES, an individual,

13 Plaintiff,

14 vs.

16 BATH & BODY WORKS, LLC, a
17 Delaware limited liability company,

18 Defendants.

Case No. 2:16-cv-02989-MCE-AC

**JOINT MOTION FOR
ADMINISTRATIVE RELIEF TO
EXTEND TIME FOR HEARING AND
OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO CONDUCT
LIMITED DISCOVERY [ECF NO.
178]; ORDER THEREON**

[Civil L. R. 7-11]

Complaint filed: 10/04/2014

Trial date: N/A

22 Plaintiff CRYSTAL LAKES' PLAINTIFF'S MOTION FOR LEAVE TO
23 CONDUCT LIMITED DISCOVERY [ECF No. 178] is currently pending for hearing on
24 October 15, 2020, so that opposition is due no later than October 1, 2020. As of
25 September 22, 2020, moving defendant BATH & BODY WORKS has substituted in new
26 counsel, Jeffrey M. Vucinich and Elizabeth D. Rhodes, to take over the defense of this
27 matter.[ECF No. 179] Mr. Vucinich and Ms. Rhodes have conferred with plaintiff's
28 counsel Daniel L. Stanner, Esq., and Mr. Stanner has graciously agreed to allow a 30 day

**JOINT MOTION FOR ADMINISTRATIVE RELIEF TO EXTEND TIME FOR HEARING AND
OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY [ECF NO.
178] PURSUANT TO STIPULATION; STIPULATION; ORDER THEREON**

1 continuance if this Court will permit the extension. Good cause exists to continue the
2 hearing as new counsel has had no time to review the contents of the motion that is
3 pending, and time is needed to review the voluminous file in this matter. The signing of
4 this motion sets forth the parties' agreement and stipulation to this 30-day continuance.
5 Administrative relief is therefore respectfully requested, in the form of a continuance of the
6 motion date from October 15, 2020, to a date 30 days forward, within this Court's
7 discretion, or on November 12, 2020.

8 Respectfully submitted,

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10 Dated: September 25, 2020

CLAPP, MORONEY, VUCINICH,
BEEMAN and SCHELEY

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13 By: /s/ Jeffrey M. Vucinich
JEFFREY M. VUCINICH, ESQ.
14 ELIZABETH D. RHODES, ESQ.
Attorneys for Defendant
15 BATH & BODY WORKS, LLC
16

17 Dated: September 25, 2020

TABET DIVITO & ROTHSTEIN, LLC

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19 By: /s/ Daniel L. Stanner
DANIEL L. STANNER, ESQ.
20 Attorneys for Plaintiff, CRYSTAL
21 LAKES
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ORDER

In accordance with the foregoing stipulated motion, and good cause appearing, IT IS HEREBY ORDERED THAT the hearing on plaintiff’s Motion for Leave to Conduct Limited Discovery [ECF No. 178] is continued to November 12, 2020, at 2:00 p.m., in Courtroom 7. All filing dates are to be calculated pursuant to that continued date.

IT IS SO ORDERED.

Dated: October 6, 2020



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE