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 11 BATH & BODY WORKS, LLC

12 **UNITED STATES DISTRICT COURT**  
 13 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

14 CRYSTAL LAKES, an individual,  
 15 Plaintiff,

16 v.

17 BATH & BODY WORKS, LLC, a  
 Delaware limited liability company,  
 18 Defendant.

NO. 2:16-cv-02989-MCE-AC

**STIPULATION AND [PROPOSED] ORDER  
 REQUESTING AN EXTENSION FOR  
 HEARING AND PLAINTIFF'S REPLY IN  
 SUPPORT OF HER MOTION FOR LEAVE TO  
 CONDUCT LIMITED DISCOVERY (Dkt. No.  
 178)**

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 20 Pursuant to Local Rules 143 and 144, it is hereby stipulated and agreed by and  
 21 between Plaintiff Crystal Lakes ("Plaintiff") and Defendant Bath & Body Works, LLC  
 22 ("Defendant"), through their undersigned counsel, that parties request that the Court  
 23 continue the hearing on Plaintiff's Motion for Leave to Conduct Limited Discovery (Dkt.  
 24 No. 178) (the "Motion") to December 16, 2020 at 10:00 a.m.<sup>1</sup> The grounds for this  
 25 continuance are that despite Plaintiff's diligence, due to several other matters that have  
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27  
 28 <sup>1</sup> The Motion has been submitted without oral argument pursuant to the Judge Claire's order. (Dkt. No. 184.)

1 required Plaintiff's counsel's immediate attention, Plaintiff will be unable to file her reply  
2 in support of the Motion on or before the current November 25, 2020 deadline. (See  
3 Dkt. No. 190.) Defendant previously sought two continuances of the hearing date by  
4 stipulation to allow it to file its opposition to the Motion. (Dkt. Nos. 182 and 190.) The  
5 parties stipulate that the ends of justice will be served by this continuance so that  
6 Plaintiff's counsel may have reasonable time necessary for effective preparation and  
7 filing of a proper reply brief in support of the Motion. The parties further stipulate that no  
8 party will suffer any prejudice if the requested continuance is granted. Accordingly, for  
9 these reasons and for good cause stated herein, by stipulation, the parties request that  
10 the Court continue hearing on the Motion to December 16, 2020 to allow Plaintiff to file  
11 her reply brief in support of the Motion no later than December 9, 2020.  
12

13 **IT IS SO STIPULATED.**

14 Dated: November 24, 2020

**TABET DIVITO & ROTHSTEIN LLC**

15 By: /s/ Daniel L. Stanner  
16 DANIEL L. STANNER  
17 Attorneys for Plaintiff,  
18 CRYSTAL LAKES

19 Dated: November 24, 2020

**CLAPP MORONY VUCINICH BEEMAN  
SCHELEY**

20 By: /s/ Elizabeth D. Rhodes  
21 ELIZABETH D. RHODES  
22 Attorneys for Defendant,  
23 BATH & BODY WORKS, LLC  
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**[PROPOSED] ORDER**

**Good cause appearing therefore**, pursuant to the parties' Amended Stipulation, the Court hereby continues the hearing on Plaintiff's Motion for Leave to Conduct Limited Discovery (Dkt. No. 178) to December 16, 2020 at 10:00 a.m. in Courtroom 26. All filing dates are to be calculated pursuant to that continued date.

**IT IS SO ORDERED.**

**DATED:** November 24, 2020

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE