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1 2 3 4	MANATT, PHELPS & PHILLIPS, LLP Christine M. Reilly (SBN 226388) creilly@manatt.com 11355 W. Olympic Boulevard Los Angeles, CA 90064 Telephone: (310) 312-4237 Facsimile: (310) 996-7037		
5	Attorneys for Defendant		
6	ALLIANCE HEALTH NETWORKS, LLC		
7	LINITED STATES	DISTRICT COURT	
8	EASTERN DISTRICT OF CALIFORNIA		
9	EASTERN DISTRICT OF CALIFORNIA		
10	JEFF LINGLE AND XUANDAO	Case No. 2:17-cv-00056-TLB-DB	
11	GRAY-LINGLE, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS	CLASS ACTION	
12	SIMILARLY SITUATED,	STIPULATION AND ORDER	
13	Plaintiffs,	EXTENDING TIME TO ANSWER	
14	V.	COMPLAINT AND EXTENDING TIME TO FILE JOINT REPORT	
15			
16	ALLIANCE HEALTH NETWORKS, LLC,		
17	Defendant.		
18			
19	WHEREAS, it is hereby stipulated by and between the parties, through their		
20	respective attorneys of record, as follows:		
21	WHEREAS, Plaintiffs filed their	Complaint in this action on January 10,	
22	2017 in the United States District Court for the Eastern District of California;		
23	WHEREAS, the deadline for Defendant to respond to the Complaint is April		
24	7, 2017;		
25	WHEREAS, the parties are engaged in discussions expected to lead to an		
26	early resolution of this matter;		
27	WHEREAS, Defendant seeks an extension of time of thirty (30) days to		
28			
MANATT, PHELPS & PHILLIPS, LLP Attorneys At Law	CASE NO. 17CV00056		
ATTORNEYS AT LAW Los Angeles	STIPULATION EXTEND	DING TIME TO ANSWER	

1 serve and file its response to the Complaint;

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WHEREAS, pursuant to this Court's January 10, 2017 Order (Dkt. 3), the current deadline for the parties to submit a joint status report is April 4, 2017;

WHEREAS, the parties jointly request a forty-five (45) day extension to submit their joint report;

6 WHEREAS, the requested extension will promote efficiency and settlement 7 by enabling the parties to continue pursuing a preliminary settlement and possibly secure a speedy resolution of this matter without incurring legal expenses in 8 9 preparing a responsive pleading and joint report, that would necessitate further 10 litigation expense and judicial labor.

11 WHEREAS, the parties not seek the requested extension for purposes of 12 delay, but rather to enable their attorneys pursue an early resolution of this dispute.

13 THEREFORE, the parties stipulate to and respectfully request an order 14 extending the time for Defendant to respond to the Complaint until and including 15 May 8, 2017, and extending the time for the parties to file their joint report, up to 16 and including May 16, 2017, or such other date as the Court may find appropriate.

Respectfully submitted,

18	Dete de Angeil 4, 2017	MANATT, PHELPS & PHILLIPS, LLP
19	Dated: April 4, 2017	
20		Bu: 10/ Plarieting Al Peille
21		By: <u>/s/ <i>Christine M. Reilly</i></u> Attorneys for Defendant ALLIANCE HEALTH NETWORKS,
22		LLC
23	Dated: April 4, 2017	LAW OFFICES OF TODD FRIEDMAN
24		
25		<u>/s Adrian R. Bacon</u> Adrian R. Bacon, Esq.
26	Addian K. Bacon, Esq. Attorney for Plaintiffs	
27		Jeff Lingle and Xuandao Gray-Lingle
28		
ANATT, PHELPS & PHILLIPS, LLP Attorneys At Law Los Angeles	STIPULATION AND	- 2 - CASE NO. 17CV00056 ORDER EXTENDING TIME TO ANSWER

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3	IT IS SO ORDERED.
4	Dated: April 04, 2017
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6	My - Canter
7	Troy L. Nunley United States District Judge
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28 Manatt, Phelps &	- 3 - CASE NO. 17CV00056
PHILLIPS, LLP Attorneys At Law Los Angeles	STIPULATION AND ORDER EXTENDING TIME TO ANSWER