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Attorneys for Defendant
NEXTGEN LEADS, LLC

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

SUSAN HAYES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NEXTGEN LEADS, LLC, and DOES 1
through 10, inclusive, and each of them,

Defendant.

CASE NO. 2:17-cv-00324-MCE-GGH

Hon. Morrison C. England, Jr.
Courtroom 7

**STIPULATION AND ORDER TO
EXTEND DEFENDANT
NEXTGEN LEADS, LLC'S TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT
[L.R. 144]**

Action Filed: February 14, 2017
Trial Date: None Set

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

1 Plaintiff Susan Hayes and defendant NextGen Leads, LLC, by and through
2 their respective counsel of record, hereby stipulate as follows:

3 WHEREAS, on February 14, 2017, plaintiff filed the complaint in the
4 United States District Court for the Eastern District of California (ECF No. 1);

5 WHEREAS, on February 21, 2017, plaintiff served the complaint on
6 defendant;

7 WHEREAS, defendant currently has until April 11, 2017 to answer or
8 otherwise respond to plaintiff's complaint;

9 WHEREAS, defendant requested, and plaintiff consented, to an additional
10 twenty-one (21) days for defendant to answer or otherwise respond to plaintiff's
11 complaint;

12 WHEREAS, pursuant to Federal Rule of Civil Procedure Rule 6 and Eastern
13 District of California Local Rule 144, the parties agree to extend the defendant's
14 time to respond to the complaint through and including May 2, 2017;

15 WHEREAS, good cause exists to grant an extension of time for defendant to
16 respond to the complaint until May 2, 2017 because defendant voluntarily
17 produced information to expedite prompt resolution of this matter and the parties
18 are currently engaging in settlement discussions;

19 WHEREAS, an additional twenty-eight (21) days for defendant to respond
20 to plaintiff's complaint will not alter the date of any event or any deadline already
21 fixed by Court order, or prejudice any party;

22 THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
23 through their respective counsel, that defendant's time to answer or otherwise
24 respond to plaintiff's complaint shall be extended through and including May 2,
25 2017.

26 Dated: April 12, 2017

VENABLE LLP

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28 By: /s/ Ari N. Rothman

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Ari N. Rothman
Bety Javidzad
Attorneys for Defendant NEXTGEN
LEADS, LLC

Dated: April 12, 2017

LAW OFFICES OF TODD M.
FRIEDMAN

By: /s/ Todd M. Friedman
Todd M. Friedman
Attorneys for Plaintiff SUSAN
HAYES

ATTESTATION REGARDING SIGNATURES

I, Ari N. Rothman, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 12, 2017

VENABLE LLP


By: /s/ Ari N. Rothman
Ari N. Rothman
Bety Javidzad
Attorneys for Defendant NEXTGEN
LEADS, LLC

ORDER

Pursuant to the stipulation of the parties and good cause appearing, it is hereby ordered that Defendant's time to answer or otherwise respond to Plaintiff's complaint shall be extended through and including May 2, 2017.

IT IS SO ORDERED.

DATED: April 12, 2017



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE