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

11 ROSE MARY KALANI,

12 Plaintiff,

13 vs.
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15 JON'S AUTOMOTIVE INC. dba JON'S PIT
16 STOP 2, et al.;

17 Defendants.
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) No. 2:17-cv-00338-WBS-GGH
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) **STIPULATION GRANTING PLAINTIFF**
) **LEAVE TO FILE FIRST AMENDED**
) **COMPLAINT; [PROPOSED] ORDER**
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20 **IT IS HEREBY STIPULATED** by and between Plaintiff, Rose Mary Kalani
21 (“Plaintiff”), and Defendants, Jon’s Automotive Inc. dba Jon’s Pit Stop 2; Jonathan C. Luy,
22 Trustee of the Luy 1996 Revocable Trust, and Polly K. Luy, Trustee of the Luy 1996
23 Revocable Trust (collectively “Defendants,” and together with Plaintiff, the “Parties”), the
24 parties hereto, through their respective attorneys of record, that Plaintiff may file a First
25 Amended Complaint, a copy of which is attached hereto as Exhibit “A.” This amendment will
26 not modify any date or deadline fixed by the Court’s Status (Pretrial Scheduling) Order dated
27 August 18, 2017 (Dkt. 19) pursuant to Fed. R. Civ. P. 16(b)(4), and is not prejudicial to
28 Defendants, the product of undue delay, proposed in bad faith, or futile.

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; [PROPOSED]
ORDER

1 **IT IS FURTHER STIPULATED** that Plaintiff will file her First Amended Complaint
2 within five (5) calendar days of the Court's Order permitting such filing, and that Defendants'
3 response thereto shall be filed within fourteen (14) days after the First Amended Complaint is
4 filed.

5 **IT IS SO STIPULATED.**

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7 Dated: September 14, 2017

MISSION LAW FIRM, A.P.C.

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9 /s/ Zachary M. Best

10 Zachary M. Best
11 Attorneys for Plaintiff,
12 Rose Mary Kalani

13
14 Dated: September 14, 2017

VAUGHAN & ASSOCIATES

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16 /s/ Cris C. Vaughan

17 Cris C. Vaughan
18 Attorneys for Defendants,
19 Jon's Automotive Inc. dba Jon's Pit Stop 2;
20 Jonathan C. Luy, Trustee of the Luy 1996
21 Revocable Trust, and Polly K. Luy, Trustee of the
22 Luy 1996 Revocable Trust

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28 **ORDER**

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that Plaintiff shall file her First Amended Complaint, a
copy of which was filed with the Parties' stipulation, within five (5) calendar days of the date
this Order is filed.

IT IS FURTHER ORDERED that Defendants' response thereto shall be filed within
fourteen (14) days after the First Amended Complaint is filed.

IT IS SO ORDERED.

Dated: September 14, 2017



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; [PROPOSED]
ORDER